



American Electric Power
400 West 15th Street, Suite 1520
Austin, TX 78701
aep.com

May 17, 2019

Mr. David Eppler, Enforcement Officer
Superfund Enforcement Assessment Section (6SF-TE)
U.S. EPA, Region 6
1445 Ross Avenue
Dallas, Texas 75202-2733

RECEIVED
19 MAY 22 AM 10:05
SUPERFUND DIV.
DIRECTOR'S OFF.

**Re: F.J. Doyle Salvage Superfund Site (SSID 061D), Leonard, Fannin County, Texas
EPA Region 6 CERCLA 104(e) Information Request
Response of Southwestern Electric Power Company ("SWEPCO") and
Public Service Company of Oklahoma ("PSO")**

On behalf of SWEPCO and PSO, American Electric Power Services Corporation ("AEPSC") is responding to EPA Region 6's information request dated February 15, 2019. By phone conversation and electronic mail dated February 26, 2019, AEPSC, requested an extension of time to respond to the information request. By letter dated, March 14, 2019, EPA Region 6, granted an extension until May 20, 2019. AEPSC appreciates this additional time to conduct a thorough search of records.

SWEPCO operates a diverse electric power generation portfolio and electric transmission and distribution systems in western Arkansas, northwest and central Louisiana, northeast Texas and the Texas Panhandle serving 535,000 customers. PSO is one of the largest distributors of wind energy serving 500,000 customers in northeast and central Oklahoma.

General Objections to Instructions and Definitions

1. AEPSC objects to the requests to the extent they seek information or documents that SWEPCO or PSO have no obligation to develop or are beyond the scope of CERCLA. Such requests are overly broad, unduly burdensome, arbitrary and capricious.
2. AEPSC objects to the definition of "material" and "materials" as being vague, ambitious, overly broad and unduly burdensome and beyond the scope of CERCLA. CERCLA does not grant authority to seek CERCLA responsibility for "any and all objects, goods, products, by-products, substances, or matter of any kind."

3. AEPSC objects to the definition of "document" as being overly broad and unduly burdensome to the extent that it seeks information as a "document" that is irrelevant and outside the scope of CERCLA.

With respect to the matters addressed in the Instructions and Definitions, AEPSC will comply with applicable rules and law. Responses and objections to the individual requests are set out below. The request is set forth first and is followed by AEPSC's response.

1. Please provide the full legal name, mailing address, and phone number of the Respondent.

Below is the full legal name, address of the principal legal office and phone number:

Southwestern Electric Power Company
1 Riverside Plaza
Columbus , Ohio 43215
United States
1-888-216-3523

Public Service Company of Oklahoma
1 Riverside Plaza
Columbus , Ohio 43215
United States
1-888-216-3523

2. For each person answering these questions on behalf of the Respondent, provide full name, title, business address, business telephone and facsimile number.

Elizabeth Gunter
Senior Counsel
AEP Legal
400 West 15th Street
Austin, TX 78701
(512) 481-3328

Brian Whatley
Environmental Specialist Consultant
Arsenal Hill PS Environmental Lab
502 N Allen Ave, 01
Shreveport, LA 71101-2669
(318) 673-3838

Brian Bond
V.P. External Affairs
Shreveport General Office
428 Travis, 04
Shreveport, LA 71101
(318) 673-3595

Malcolm Smoak
President & COO - SWEPCO
Shreveport General Office
428 Travis, 04
Shreveport, LA 71101
(318) 673-3399

John Flood
Regional Environmental Consultant
Abilene Meter Services Office
910 Energy Dr, 01
Abilene, TX 79602-7945
(325) 674-3253

Randy Solomon
Environmental Specialist Consultant
Dallas Office Renaissance Tower
1201 Elm Street, Suite 4100, 41
Dallas, TX 75270
(214) 777-1043

- 3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, and facsimile number.**

Elizabeth Gunter
Senior Counsel
AEP Legal
400 West 15th Street
Austin, TX 78701
(512) 481-3328 (o)
legunter@aep.com

- 4. Has any material or equipment owned or used by Respondent ever been sold to, supplied to, or otherwise turned over to FJ Doyle for scrapping, salvage, repair, consignment, resale or any other purpose?**

AEPSC objects to this request as it is arbitrary and capricious by seeking information on "material" or "equipment" that has been "sold to," "supplied to," or "otherwise turned over." It is unclear what the phrase "supplied to" or "otherwise turned over to" means. Further, AEPSC objects because this request seeks information that is outside the scope of CERCLA, which does not attach responsibility for items that are sold, supplied or turned over. AEPSC also objects to the question because it is overly broad and unduly burdensome. EPA has not provided or shared any information with SWEPCO or PSO that indicates a connection to the Site sufficient to impose responsibility or that provides a specific timeframe for conducting a relevant record search.

Notwithstanding these objections, SWEPCO and PSO have conducted a thorough search for records and spoken with employees about any business relationship with F.J. Doyle. The information and documents that we have located to date are included with this response. These documents are from AEPSC's Environmental Services Shreveport office environmental audit file and indicate that SWEPCO had a business relationship with F.J. Doyle although the exact details of the relationship are not contained in the file. SWEPCO was unable to locate records of actual equipment transfer or sale. AEPSC has been unable to locate any documents or evidence that PSO had any relationship with F.J. Doyle or the Site. The information of which AEPSC is aware that references a connection between PSO and F.J. Doyle has been anecdotal.

- 5. Has any material or equipment owned or used by Respondent ever been sent to the Site for scrapping, salvage, repair, consignment, resale or any other purpose?**

Please refer to the response to #4.

- 6. If your answer to either or both questions is yes, provide a complete list of all such material or equipment, as well as any and all shipments thereof; include the following information with your response.**

AEPSC objects to this question as it is overly broad and unduly burdensome to the extent that it does not contain a timeframe for the information it requests and seeks records and "lists" that are not otherwise required to be maintained by SWEPCO or PSO.

Notwithstanding these objections, neither SWEPCO nor PSO located any detailed records on the specific transformers sent to the Site, but provides the following responses below.

- a. The reason and approximate date(s) the material or equipment was taken out of service, and the date(s) sold, scrapped, disposed of, or otherwise turned over to JF Doyle, or the date sent to the Site, if applicable.**

The documents found to date indicate that SWEPCO may have sent various size transformers that had been taken out of service and retired to F.J. Doyle for purposes of scrap metal resale. The documents indicate that SWEPCO may have sent transformers during the 1983 – 1999 timeframe with a possible transformer sent during the late 1970's. From the documents and employee interviews, only drained transformers that previously contained < 50 ppm PCB oil were sent to F.J. Doyle.

- b. Describe the condition of the material or equipment when it was sold, scrapped, disposed of, or otherwise turned over to FJ Doyle, or sent to the Site, if applicable.**

Please see the response to 6.b. above and attached documents.

- c. List any amount of money paid or received by Respondent in relation to the sale, transfer, or delivery of the material or equipment. Indicate whether the price was reduced because of the inclusion of hazardous substances in the material or equipment.**

The attached documents contain a contract between SWEPCO and F.J. Doyle dated August 1994 for the sale of retired transformers with pricing based on transformer size. SWEPCO did not send hazardous substances to the Site. SWEPCO has been unable to locate any earlier contracts. See attached documents available to date.

- d. For each item of material or equipment, indicate whether it contained any oil when turned over to FJ Doyle. Supply any and all records that may indicate the contents of the oil, in particular whether the oil may have contained any PCBs. Indicate what steps were taken to determine whether the oil contained any PCBs at the time of taking out of service or of disposal, and explain what precautions were taken to ensure that any PCBs in the equipment were disposed of properly.**

Please see attached documents available to date that indicate that transformer oil was tested to confirm PCB content. Based on verbal communication, those transformers containing less than 50 ppm PCB we understand were loaded and shipped off site.

- e. **Supply all documents pertaining to the transaction, and to the movement or shipment of the material or equipment from your property, or from property where you operate.**

See attached documents.

- f. **For each instance of equipment or material turned over to FJ Doyle or sent to the Site, indicate whether the equipment or material was transported by FJ Doyle, or by a separate company. In the case of the latter, identify both the individual and the company supplying the transportation services.**

Based on a general understanding of business practices and the attached contract document, SWEPCO would have loaded a vendor's trailer with a retired drained transformer. The April 1999 audit report also indicates that transformers were transported on F.J. Doyle owned trucks.

- g. **Identify all persons who controlled and/or transported the material or equipment prior to delivery to the Site. Include job title, duties, dates performing those duties, supervisors for those duties, current position, and if applicable, the date of the individual's resignation or termination.**

AEPSC does not have this knowledge.

- h. **Provide the correct name and address of Respondent's plants and other facilities from which Respondent sold or supplied equipment or material to FJ Doyle or otherwise sent equipment or material to the Site.**

AEPSC objects to this question as it is overly broad and unduly burdensome to the extent it seeks information unrelated to the Site and that is outside the scope of CERCLA.

Notwithstanding AEPSC's objections, SWEPCO operates the following service centers that historically receive transformers that are taken out of service.

Shreveport, LA Service Center
6130 Union Street
Shreveport, LA 71108

Longview, TX Service Center
4421 W. Loop 281
Longview, TX 75604

Texarkana, TX Service Center
3708 W. 7th Street
Texarkana, TX 75501

Fayetteville, AR Service Center
101 W. Township Street
Fayetteville, AR 72703

- i. **Provide a brief description of the nature of Respondent's operations at each plant or facility referenced above, including: the date such operations commenced and concluded; and types of work performed at each plant or facility, including but not limited to the industrial, chemical, or institutional processes and treatments undertaken at each plant or facility.**

AEPSC objects to this question as it is overly broad and unduly burdensome to the extent it seeks information unrelated to the Site and that is outside the scope of CERCLA. EPA has not alleged how Respondent's facilities and its operations relate to the Site. AEPSC also objects to the question as being vague and ambiguous because it is not clear what operations EPA is questioning and EPA provides no specific timeframe.

Notwithstanding these objections, SWEPCO's service centers support SWEPCO's transmission and distribution operations by providing equipment and equipment repair services.

7. **List, describe, and provide all documents relating to the information requested above. If any such documents have been destroyed, provide the dates of destruction.**

AEPSC objects to this request as being overly broad and unduly burdensome to the extent that it seeks information that is outside the scope of CERCLA. Information on AEPSC's record retention policies and methods of document destruction are not relevant to whether AEPSC has additional documents, any meaningful connections to the Site or contributed hazardous substances. AEPSC also objects to this request for being vague and ambiguous by requesting documents without specifying any timeframe. This request is objectionable because it requires speculation and assumes documents are available.

Notwithstanding this objection, AEPSC has conducted a diligent search and has not located any documents or evidence of documents that are responsive to this information request beyond those attached.

8. Did Respondent ever sell or supply transformers or any other oil-containing equipment to FJ Doyle or otherwise send transformers or any other oil-containing electrical equipment to the Site? If so, provide the following details for each item that was sold or supplied to FJ Doyle or may have been sent to the Site:

- a. The name of the manufacturer and serial number;
- b. The quantity of oil contained in the equipment;
- c. The concentration of PCBs contained in the oil;
- d. The purpose of the shipment (e.g., salvage, repair or resale);
- e. The date on which the equipment left your facility;
- f. The company name, address, and telephone number of the transporter; and
- g. The names, addresses, telephone numbers, and dates of ownership of any and all prior owners.

Please see the responses to questions #4-6 above. To the best of SWEPCO's knowledge, only transformers were sent off-site when retired to F.J. Doyle.

9. Provide legible copies of any and all contracts, invoices, receipts, or other documents describing the transactions that Respondent implemented with FJ Doyle for each item identified in the question above.

AEPSO objects to this request for being vague and ambiguous by requesting documents without specifying any timeframe. Notwithstanding this objection, please see the attached documents and the response to question #4.

10. Provide legible copies of any and all contracts, invoices, receipts, or other documents related to the transaction that Respondent implemented with transporters to transport the items in the question above.

Please refer to the response to question #9.

11. Describe how both PCB-contaminated oil and uncontaminated oil were emptied from electrical transformers and capacitors or other electrical equipment and stored at Respondent's facilities.

AEPSO objects to this request as it requests information about SWEPCO's operations that are unrelated to the Site. The attached documents indicate that SWEPCO sent retired and drained of all oil transformers that had contained < 50 ppm PCB to the Site.

12. Identify and describe, and provide all documents that refer or relate to, the following:

AEPSC objects to these requests as they imply that SWEPCO and PSO had knowledge of F.J. Doyle's operations. AEPSC objects to any of the specific requests that seek knowledge about operations at a site or imply that operational control over practices at the Site.

a. How were hazardous substances or materials containing hazardous substances used or planned to be used at the Site?

AEPSC has no specific knowledge of the use of materials containing hazardous substances at the Site.

b. What was done to any hazardous substances once they were sent to the Site, including any service, repair, recycling, treatment, or disposal?

AEPSC has no specific knowledge of what was done to any hazardous substances once they were sent to the Site other than as reported in the attached documents.

c. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?

AEPSC has no specific knowledge of the activities or business practices at the Site beyond the information contained in the attached documents.

d. How were hazardous substances typically used, handled, or disposed of at the Site?

AEPSC has no specific knowledge of the use of hazardous substances at the Site. See the response to questions 12. b and 12. c.

e. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? When travelling to the Site, explain the details of the visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.

SWEPCO can confirm that representatives traveled to the Site to perform a site inspection for purposes of an environmental audit in 1993 and November 1997. In 1989, a representative of Central and Southwest Services, parent company of SWEPCO, performed a site visit for purposes of conducting an audit.

f. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?

AEPSC has no specific knowledge of the use or disposal of hazardous substances at the Site.

- g. Did Respondent have any influence over waste disposal activities at the Site? If so, how?**

Neither SWEPCO nor PSO had influence over waste disposal practices at the Site.

- h. Did Respondent know if the owner(s) and/or operator(s) of the Site were removing a hazardous substance from the transferred material?**

SWEPCO sent drained and empty transformers to the Site and had no knowledge of hazardous substance removal.

- i. Did Respondent know, based on general industry knowledge, if the hazardous substances would need to be removed from the transferred material in order for that material to be useful?**

Based on the audit reports attached and audit site visits, electrical equipment was dismantled to separate metals by type and to separate metals from non-metal components; this is general knowledge for scrap operations. During the 1997 site visit, SWEPCO learned that used oil resulting from F.J. Doyle's process was shipped by F.J. Doyle to John Scoggins Company.

- j. What percentage of Respondent's total hazardous substances went to the Site?**

Please see attached documents.

- k. What steps did Respondent take to dispose of or treat any hazardous substances among the materials transferred to the Site? Provide any agreements and documents, including waste logs, journals, or notes, reflecting these steps.**

Please refer to the responses to questions #6. and 11.

- l. What involvement did Respondent have in selecting the particular means and method of disposal of the hazardous substances at the Site?**

Neither SWEPCO nor PSO had influence over disposal practices at the Site. Please refer to the response to question #12.g.

- m. At the time Respondent transferred the materials containing hazardous substances to the Site, what did Respondent intend to happen to the hazardous substances? Provide any agreement and documents, including waste logs, journals, or notes, reflecting the intention of the parties. If Respondent does not have such documents and/or materials, please so state.**

Neither SWEPCO nor PSO transferred hazardous substances to the Site.

- n. With respect to all arrangements involving materials containing hazardous substances, at the time of the arrangement, specify the measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owners/operators at the Site regarding the proper handling and ultimate disposition of the materials Respondent sent there?**

The attached audit reports provide information about treatment practices at the Site. The audit report also documents that during the 1997 audit interview with F.J. Doyle that F.J. Doyle revealed that area residents collected oil from the shop to use as weed killer around their property. The 1997 audit site inspection indicated poor practices for managing residual oil during equipment dismantling. The floor of the shop was either concrete or dirt.

- o. What efforts, if any, did Respondent take to investigate the nature of the operations conducted at the Site and the environmental compliance of the Site prior to selling, transferring, delivering (e.g., for repair, consignment, or joint-venture), disposing of, or arranging for the treatment or disposal of any hazardous substances.**

Please see attached documents.

- p. How long did Respondent have a relationship with the owner(s) and/or operator(s) of the Site?**

The attached documents indicate that SWEPCO had a business relationship with the owner of the Site for about 15 – 17 years.

- q. Provide names, addresses, telephone numbers, and email addresses of any individuals, including former and current employees, who may be knowledgeable of Respondent's operations and practices concerning the handling, storage and disposal of hazardous substances at the Site.**

Please see the response to question #2.

- 13. If any documents solicited in the information request are no longer available please indicate the reason why they are no longer available.**

AEPSC objects to this request as being overly broad and unduly burdensome to the extent that it seeks information that is outside the scope of CERCLA. Information on AEPSC's record retention policies and methods of document destruction, are not relevant to whether AEPSC has additional documents or any meaningful connections to the Site or contributed hazardous substances. AEPSC also objects to this request for being vague and ambiguous by requesting documents without specifying any timeframe. This request is objectionable because it requires speculation and assumes documents might be available.

Notwithstanding these objections, to the best of AEPSC's knowledge, AEPSC does not know what if any, additional documents existed or if they did exist why they are no longer available.

14. If you believe there may be any person(s) able to provide a more detailed or complete response to any of the preceding questions and/or sub-questions or any person(s) who may be able to provide additional responsive documents, please identify such person(s) and the additional information you believe they may have.

AEPSC is unaware of person(s) who may provide a more detailed or complete response to the preceding questions or be able to provide documents relevant to this inquiry. SWEPCO personnel understand that SWEPCO ceased to use F.J. Doyle to buy retired transformers around the time of the 1997-1998 audit. AEPSC will continue to visit with employees and will supplement this response with additional names if necessary.

FOIA Request and AEPSC Right to Supplement its Response

AEPSC submitted a FOIA request to EPA seeking information about the F.J. Doyle Site. EPA requested an extension in which to provide these documents, which AEPSC has agreed to. In the event AEPSC does receive information from EPA in response to its FOIA request or otherwise that necessitates a modification of any of these answers, AEPSC will supplement this response.

AEPSC would like to meet with EPA about its response. My contact information is contained in this response.

I certify that this document and attachment were prepared under my direct supervision.

Sincerely,



Elizabeth Gunter
Counsel for SWEPCO and PSO

EG/cjs

Attachment (1)

Smead

No. 2ET500
HASTINGS, DN





Southwestern Electric Power Company

A Member of the Central and South West System

August 29, 1994

Mr. Frank J. Doyle
P. O. Box 312
Leonard, TX 75452

Dear Mr. Doyle:

Enclosed is an original, fully executed copy of Contract #3188 for our scrap transformer salvage.

If you have any questions, please call me at (318) 673-3417. We look forward to continuing work with you.

Sincerely,

Ronald L. Cosby
Mgr. Transformer & Meter Services

RLC/ci
Enclosure
cc: Mike Jones

Form 121	
INTER-OFFICE MEMO	
SOUTHWESTERN ELECTRIC POWER COMPANY	
To	John Feeney
From	TRANS. SERVICES - A.H. 11
Date	10/26
By	R. L. Cosby
<input type="checkbox"/> Please answer direct and send me copy.	
<input type="checkbox"/> Please approve and forward.	
<input type="checkbox"/> Please approve and return to me.	
<input type="checkbox"/> Please complete and return to me.	
<input type="checkbox"/> Please file.	
<input type="checkbox"/> For your information.	
<input type="checkbox"/> Please take charge of this.	
<input type="checkbox"/> Please note and forward.	
<input type="checkbox"/> Please note and return to me.	
<input type="checkbox"/> Please prepare reply for my signature.	
<input type="checkbox"/> Please sign/initial and return to me.	
<input type="checkbox"/> Your comments please.	
<input type="checkbox"/> Retaining.	
<input checked="" type="checkbox"/> Completed per your request.	
REMARKS:	P. O.
428 Travis	
OVER <input type="checkbox"/>	

000002

This Agreement made and entered into by and between SOUTHWESTERN ELECTRIC POWER COMPANY, a Delaware Corporation, party of the first part, hereinafter called "COMPANY," and Frank J. Doyle Corporation _____ (Name of organization), a scrap metal recycler _____ (Type of Organization), authorized to do business in Texas _____ (State), domiciled at 305 Cottonwood _____ (Street), Leonard, Texas 75452 _____ (City, State, and Zip Code), party of the second part, operating as a Contractor, hereinafter called the "CONTRACTOR."

WITNESSETH THAT: for and in consideration of the premises and the mutual agreement and undertakings of the parties hereto, the CONTRACTOR agrees to the following terms and conditions:

(1) The CONTRACTOR agrees to furnish all labor, tools, and equipment, and to pay all expenses necessary for performing miscellaneous work to include purchasing of scrap transformers to be loaded on trailers furnished by F. J. Doyle _____

_____ or similar jobs as authorized by the Manager of Electric Systems, G. O. Section Manager, or their designated representative.

(2) The CONTRACTOR shall secure all permits and licenses imposed by law, pay all charges and fees, and give all notices necessary and incident to the due and lawful prosecution of his work. The CONTRACTOR shall also contract other contractors and utilities working in the area where the work is being done and attempt to coordinate his work with theirs.

(3) The CONTRACTOR shall not obligate the COMPANY to make any payments to another party, nor make any promises or representations of any nature to another party for, or in behalf of, the COMPANY without the written approval of the COMPANY.

(4) The CONTRACTOR agrees to provide and install all barricades, warning signs, flashers, etc., that may be required to protect and/or warn the public of open ditches or any other hazard created by the performance of his work.

(5) To the maximum extent permitted by law and in consideration of the benefits received under this contract, CONTRACTOR agrees that, as between itself and COMPANY, on behalf of itself and its insurers, it will defend, indemnify and hold COMPANY and COMPANY'S insurers, affiliates, directors, officers, employees, and agents (collectively "COMPANY") harmless from and against any and all claims, loss, liability, costs, damage, expenses (including but not limited to, reasonable attorney's fees and court costs) and obligations arising out of (a) any breach by CONTRACTOR of any of its representations, warranties, covenants or other agreements under this contract or (b) any personal injury or death of persons (including but not limited to injuries or death of employees, or agents of COMPANY, CONTRACTOR, or any SUBCONTRACTOR) or damage to or destruction of any property resulting from any occurrence, including but not limited to environmental damage in any way related to or arising out of the performance of the contract. In this respect, CONTRACTOR agrees to indemnify and hold COMPANY harmless from any acts or omissions, alleged or found to constitute negligence or other fault, caused directly or indirectly or solely by the COMPANY, its directors, officers, employees, or agents or jointly by the COMPANY, its directors, officers, employees, or agents and the CONTRACTOR, its agents, representatives, employees or SUBCONTRACTORS; or solely by the CONTRACTOR, its agents, representatives, employees or

SUBCONTRACTORS. The CONTRACTOR agrees that it is the specific intent of CONTRACTOR to indemnify the COMPANY from the negligent acts or omissions of the COMPANY representatives, agents, employees, officers or directors, and whether caused directly or indirectly by the negligence of the COMPANY, its officers, agents, directors, representatives and/or employees; providing nothing herein shall create an obligation of CONTRACTOR to indemnify and hold harmless COMPANY from any claim, loss, liability, costs, damage or expense resulting from the willful and wanton negligence of COMPANY.

(6) In the event and to the extent that a claim is made by an employee of CONTRACTOR or any SUBCONTRACTOR against COMPANY or against any of COMPANY'S corporate affiliates, directors, officers, employees, agents or independent contractors, the intent of the preceding paragraph is that CONTRACTOR shall and hereby agrees to indemnify COMPANY, its corporate affiliates, directors, officers, employees, and agents to the same extent as if the claim was made by a nonemployee of CONTRACTOR or SUBCONTRACTOR. Accordingly, in addition to other provisions herein and in order to render the parties' intent of this indemnification covenant fully enforceable, CONTRACTOR, to the limited extent of an indemnification claim hereunder, expressly and without reservation waives any defense or immunity it may have under any applicable workers' compensation laws or any other statute of judicial decision disallowing or limiting such indemnification and consents to a cause of action for indemnity.

(7) In the event that CONTRACTOR or CONTRACTOR'S insurance company fails to undertake the defense of any suit or claim arising out of this contract and for which CONTRACTOR owes the duty of indemnification, or undertakes any such defense on a delayed, conditional, restricted or qualified basis, and the COMPANY, in its sole discretion, thus finds it necessary to employ attorneys, investigators, expert witnesses and do such other things as are reasonably necessary to investigate and/or defend the claim or suit, then, in such event, CONTRACTOR obligates itself to pay any and all such costs and expenses, including court costs as may have been reasonably incurred by the COMPANY.

(8) The CONTRACTOR further agrees to save the COMPANY harmless from the payment of any contribution under the State Unemployment Compensation Act, and CONTRACTOR agrees that if it is subject to the State Unemployment Compensation Act, it will make whatever contributions are required under and by virtue of the provision of said Act to the proper authorities. CONTRACTOR shall furnish the COMPANY with proof that the Social Security has been paid and that all of its employees have been paid.

(9) The CONTRACTOR shall furnish evidence that the following insurance requirements have been complied with:

KIND	LIMITS OF LIABILITY
(A) Public Liability	\$500,000
(B) Motor Vehicle Liability	\$500,000

(10) Should CONTRACTOR fail to prosecute the work to the satisfaction of the COMPANY or to comply with any of the provisions of this agreement, the COMPANY may terminate this agreement upon twenty-four (24) hours' written notice to the CONTRACTOR.

(11) Payment by the COMPANY to the CONTRACTOR for work herein provided to be done shall be upon the following basis:
See Exhibit "1", attached. _____

(12) It is understood and agreed by and between the parties hereto that the CONTRACTOR herein is an independent CONTRACTOR and not an agent or employee of the COMPANY, that the CONTRACTOR shall employ, direct, control, supervise, manage, discharge and pay his own employees; that the COMPANY shall have no control of, or supervision over, the employees of the CONTRACTOR; that the CONTRACTOR is responsible to the COMPANY only for the furnishing of the proper tools and equipment, adequate crew supervision, and doing of the work called for in the contract in a good and workmanlike manner, and in accordance with the terms of the contract and to the satisfaction of the COMPANY.

(13) Approval by the COMPANY as required by sections of the Agreement shall be interpreted to mean approval by the COMPANY'S Manager of Electric Systems, G. O. Section Manager, or his designated representative.

(14) The CONTRACTOR specifically warrants and agrees CONTRACTOR will be solely and exclusively responsible for compensating any of CONTRACTOR'S employees, subcontractors, materialmen and/or suppliers of any type or nature whatsoever and that no claims or liens of any type will be filed against any property owned by SWEPCO arising out of or incidental to the performance of any services performed pursuant to this contract. In the event a lien is filed, the CONTRACTOR agrees, upon written notice from SWEPCO, to immediately obtain a bond at its expense so as to bond the property free and clear from the said lien and hold SWEPCO harmless from any losses that may result from the filing or enforcement of said lien.

(15) The CONTRACTOR covenants, represents, and warrants:

(a) That all applicable provisions of Executive Order No. 11,246, dated September 24, 1965, the Rules and Regulations promulgated thereunder by the Office of Federal Contract Compliance of the United States Department of Labor, and all applicable requirements of the Equal Employment Opportunities Subchapter of the Civil Rights Act of 1964 and Section 402 of the Vietnam Era Veterans Readjustment Assistance Act of 1974 and Section 503 of the Rehabilitation Act of 1973 will be fully met and observed in respect to the performance of services covered by this contract;

(b) That it has taken affirmative action to ensure that applicants for employment by it and its employees are dealt with without regard to race, color, religion, sex, or national origin.

(16) This contract shall cover :

a 24-month period from September 1, 1994 through August 31, 1996.

IN WITNESS WHEREOF: the parties hereto have caused this Agreement to be executed in duplicate by their proper officers this the 10 day of AUGUST, 19 94.

WITNESS:

Bob Kaylor

F.J. Doyle
CONTRACTOR

BY F.J. DOYLE
OWNER
TITLE

8/10/94
DATE

WITNESS:

R. J. Berglund

SOUTHWESTERN ELECTRIC POWER COMPANY

M. J. Maden
Director of Engineering Services

8/17/94
DATE

R. J. Berglund
CHECKED & APPROVED:

M. J. Maden
Vice President-Operations
& Engineering DMC

8/22/94
DATE

Manager of Transformers

& Meter Services

Insurance

Environmental

R. J. Berglund
John Berglund
Brian Berglund

EXHIBIT "1"

SCRAP TRANSFORMERS

1.5 kVA to 50 kVA	\$1.25/kVA
75 kVA to 167 kVA	\$1.00/kVA
200 kVA to 1000 kVA	\$.40/kVA

The Company agrees to load transformers for Contractor at Company's facility.
Contractor takes immediate possession of transformers when they are loaded.

Phone Memo

August 9, 1994

I spoke with Peter Charles of Worldwide Reclamation. His firm was hired by F.J. Doyle to do some environmental consulting work.

He told me that Mr. Doyle had acquired the necessary TNRCC generator and transporter ID's, and waste codes. An ash sample from his oven was tested for TCLP and tested non-haz. Also Pb and PCBs were negative. The TPH content was around 3500 ppm. This waste is classified as a Class 1 non-hazardous waste and will be disposed of at the Republic landfill in Avalon, TX.

The wastes listed on his NOR are:

Used Oil	00012061
Ash	00023041
General Plant trash	00039012

Mr. Charles suggested that Mr. Doyle cover his waste oil tanks to prevent stormwater contact and runoff. He also suggested that Mr. Doyle set up an area with containment for receiving transformers. He also suggested that he apply for a PI-7 exemption for his oven.

Mr. Charles asked me if we send PCB analyses results when we ship transformers to Doyle. I told him that I wasn't sure.



modern welding company of texas, inc

METAL PRODUCTS COAST TO COAST

715 Sakowitz Street

Houston, Texas 77020

Phone 713/675-4211 800/833-5993

FAX 713/673-4062

Storage Tanks — Pressure Vessels

Carbon and Alloy Fabrication

From the desk of

John Flood

Date

7-20-93

Frank Deagle called to tell me
that he has received the
following I.D. nos.

EPA I.D. TX D 980865109

Two Transpact I.D. 80951

He has not received a Turc
generator I.D. yet.

I spoke with Tom's Henry at Worldwide
Consultants. I asked if he could give me
information on what they did for E.T. People
to take a message to send he would pass
it on. (Bob Cook is setting up a 2yr
contract with Mr. Deagle & at times
following up on discrepancies noted in our
6-24-93 audit.)

Augusta, GA / Bowling Green, KY / Burlington, IA / Elizabethtown, KY / Fresno, CA
(706) 722-3411 / (502) 781-6905 / (319) 754-6577 / (502) 769-1368 / (209) 275-9353

Houston, TX / Madisonville, KY / Newark, OH / Orlando, FL / Owensboro, KY
(713) 675-4211 / (502) 821-3575 / (614) 344-9425 / (407) 843-1270 / (502) 683-5323

SOUTHWESTERN ELECTRIC POWER COMPANY
A Member of the Central and South West System

no. 11111-11111
I thought it interesting that you requested an audit on this facility and I was not at least notified!
Ward M.
7/26/93

FOR COMPANY BUSINESS ONLY

SUBJECT: F.J. Doyle Junk Transformer Salvage Audit

DATE: July 8, 1993

FROM:	<u>John Flood</u>	<u>252</u>	<u>Environmental</u>	<u>Arsenal Hill</u>
		<small>EXT.</small>	<small>DEPT.</small>	<small>LOCATION/ROOM</small>
TO:	<u>Frank Bryan</u>		<u>Construction</u>	<u>412M</u>
			<small>DEPT.</small>	<small>LOCATION/ROOM</small>

At your request, Brian Whatley and I conducted an audit of F.J. Doyle Junk Transformer Salvage in Leonard, Texas on June 24, 1993. Mr. Doyle accompanied us on the facility inspection and afterwards answered our questions satisfactorily.

Our impressions of his business are:

1. The site is small but fairly well maintained considering the nature of his business. He had recently constructed a concrete containment structure around his aboveground waste transformer oil tanks and indicated that he planned to build a roof over the area. His tanks do not meet the minimum volume requirements for an SPCC plan. We were able to identify many transformers on his yard that came from SWEPCO. His primary business is metal recovery from the transformers; however, some transformers are taken to rewinders then sold for reuse.
2. Several wastes are generated in the transformer dismantling and metal recovery processes. One is ash from a burn-out oven and the other is waste transformer oil. These wastes are regulated under the Texas Water Commission (TWC) Industrial Solid Waste Regulations. Mr. Doyle does not have the proper registrations nor waste management controls in place to properly manage these wastes.
3. Mr. Doyle does not have an adequate recordkeeping system. He told us that he receives documentation with each load of transformers stating that the PCB concentration of each unit is < 50 ppm PCBs. However, he only keeps these records until the transformers are paid for. Two or three years ago he was inspected by EPA or TWC (he was not sure which one). When the inspectors arrived at his site, one of them suited up and they began collecting soil samples around his transformer storage yard and home. Sometime later he was notified that the samples were clean. He did not have the names of the inspectors, which agency they were from, photos, or a report of the inspection.

In order for us to recommend that SWEPCO continue doing business with F.J. Doyle, we feel that Mr. Doyle should:

1. Obtain a Texas Water Commission generator ID number for generating solid waste in Texas.

7/20/93 8⁰⁰ AM

Frank Doyle called -

said he has retained Worldwide consultants,
of Dallas, TX (214-329-0052) to prepare his
requests for:

Transporter ID

Generator ID

Waste codes

- ash

- oil.

They are trying to file the requests with TWC
by the end of this week.

We can call ~~Worldwide~~ Worldwide if we have
any questions.

B.U.

7-13-93 2:00 p-

Frank Doyle called to tell me that he has obtained a
temporary transporter ID as DFFFF. He has
applied for a generator ID + waste codes for his
waste - will keep us posted.

Phone Memo

6-13-93

2:45 pm

I informed Frank of the findings of our audit on 6-24-93. He said that he would contact Turi & get the necessary applications to complete. I asked him to keep me posted & call if I could help.

John Smith

SOUTHWESTERN ELECTRIC POWER COMPANY
A Member of the Central and South West System

FOR COMPANY BUSINESS ONLY

SUBJECT: F.J. Doyle Junk Transformer Salvage Audit DATE: July 8, 1993

FROM: <u>John Flood</u>	<u>252</u>	<u>Environmental</u>	<u>Arsenal Hill</u>
	<small>EXT.</small>	<small>DEPT.</small>	<small>LOCATION/ROOM</small>
TO: <u>Frank Bryan</u>		<u>Construction</u>	<u>412M</u>
		<small>DEPT.</small>	<small>LOCATION/ROOM</small>

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2. Several wastes are generated in the transformer dismantling and metal recovery processes. One is ash from a burn-out oven and the other is waste transformer oil. These wastes are regulated under the Texas Water Commission (TWC) Industrial Solid Waste Regulations. Mr. Doyle does not have the proper registrations nor waste management controls in place to properly manage these wastes.
3. Mr. Doyle does not have an adequate recordkeeping system. He told us that he receives documentation with each load of transformers stating that the PCB concentration of each unit is < 50 ppm PCBs. However, he only keeps these records until the transformers are paid for. Two or three years ago he was inspected by EPA or TWC (he was not sure which one). When the inspectors arrived at his site, one of them suited up and they began collecting soil samples around his transformer storage yard and home. Sometime later he was notified that the samples were clean. He did not have the names of the inspectors, which agency they were from, photos, or a report of the inspection.

In order for us to recommend that SWEPCO continue doing business with F.J. Doyle, we feel that Mr. Doyle should:

1. Obtain a Texas Water Commission generator ID number for generating solid waste in Texas.

-Page 2-

2. Obtain a TWC transporter ID number for transporting solid waste in Texas.
3. Characterize his wastes through lab testing and obtain TWC waste codes to use when disposing of these wastes.
4. Institute a recordkeeping system.
5. Analyze oil sample(s) from storage tanks for PCB content prior to shipment to Scoggins Oil Co.

The five items above would apply to any transformer salvage business in Texas.



John Flood

xc: Brian Bond
Wayne McGee
File

F.T. Doyle Leonard, TX 6-24-93 10:30 -

Oil tanks in containment built in 92 approx.

2 - 500's , 1 - 275 , 500 gal tank eliminated

EPA
TWC Ft. Worth visited 2-3 groups sampled - no response

Auto Transformer from Henderson

4045 gal oil capacity - drained near KB label

Some xfer sold to residents for reuse

McKinney junk take all junk iron

Oil dry & line put in empty cans

Leonard High School across street in Pappas

Auto from last year 16. of car , \$7.15 Big on car change
\$400 local car chg.

Call Molecular to get file on F.T. Doyle. Contract,
permits, insurance

BB 12 oven - Boyco - no ash produced. TACB
Does not require permit now.

(b) (6) - works a ship. Gary Doyle -
Sen - h - low also work. They are in Houston
visiting ALP today.

No EPA I.D. n, no Tax generator I.D.

Scoggins picks up oil - no paperwork.

City of Garland - has not had their business in 1 yr.

P.S.O. - no business in 2 yrs. Now going to OK, KS.

Valley Electric Power
Yazoo City ~~Corp~~ in Mississippi 2 coals / yr.

Louisiana power + light

Local officials

- City administrator + all others the same

A-15 6 ft fence

3 x 2 x 2 ft deep concrete pit in shop. Excess oil
pumped from pit to tanks.

32 barrels of brass a site

10-12 barrels scrap aluminum

1 B. roll off for long iron, 1 roll off for short iron.

Cut dust in drums - 3 - in shop.

Approx 2 barrels of oil / yr from burner +
broken porcelain disposed of at farm

Transformers come in with paperwork slowly concentration,
etc. Mr. Doyle ~~to~~ keeps papers until transformers are
paid for.

Brian Edwards calls on large x firms. Don Hill in
Longview, Simmie Hutchinson in Longview, Carter
Hancock in Texarkana

83 69
130
42 highway
Orcelana (150 total)
170 miles to spot

x trans bird by Eva on contract per year
Contract now expired.

TAC B Jorge Ibarra Engineering Specialist

817-732-5531

6421 Camp Bowie Blvd Suit 312

Ft. Worth TX 76116

APPENDIX A
FACILITY QUESTIONNAIRE FORM

Audited 6-24-73

by

John Flood & Brian Whitley

FACILITY QUESTIONNAIRE

INTRODUCTION

We appreciate your cooperation in completing this questionnaire. If you handwrite your responses, please be as legible as possible. If you have already prepared summaries or other documents that answer some of the questions, you can attach them to this form (but please indicate after the question that you have done so and reference the attachment and page number in which the information can be found). Where we ask for quantities or distances, best estimates are acceptable.

Improving this questionnaire is an on-going effort. If you have any recommendations for information that should be added or deleted (or questions rephrased), please give us your comments at the end of the section. Thank you for your cooperation.

Name of person(s) completing this form:

GBL Flood

Title:

Environmental Specialist

Telephone:

Date:

General Information

1. Facility name, mailing address, and telephone number:

F.S. Doyle Scrap Metals

P.O. Box 312

Leonard, TX 75452 (214) 387-3342

2. Location/address (if different):

1411 to 305 Cottonwood (his residence)
Leonard, TX

3. Principal contact(s), title(s), and telephone number(s):

F.S. Doyle

4. Type of facility (check all applicable):

- | | |
|--|---|
| a. <input type="checkbox"/> Co-disposal landfill | g. <input type="checkbox"/> Detoxification/chemical treatment |
| b. <input type="checkbox"/> Secure landfill | h. <input type="checkbox"/> Solvent recovery/recycle |
| c. <input type="checkbox"/> Aqueous treatment | i. <input type="checkbox"/> Broker/transshipment/bulk storage |
| d. <input type="checkbox"/> Incineration | j. <input type="checkbox"/> Oil recovery/recycle |
| e. <input type="checkbox"/> Biological treatment | k. <input type="checkbox"/> PCBs >50 ppm accepted at the facility |
| f. <input type="checkbox"/> Solar evaporation | l. <input checked="" type="checkbox"/> Other (describe) <u>Metal recycler</u> |

5. List the owners of the facility and their mailing addresses.

F.S. & Marie Doyle

305 Cottonwood

Leonard TX 75452

6. If the facility is a subsidiary, what is the name, address, principal contact(s), and telephone number(s) of the parent corporation/organization?

NA

7. List the facility's (and parent's) four digit Standard Industrial Classification (SIC) Code(s), with description(s):

441100
Sewerage and Sanitary Engineering

441100
Sewerage and Sanitary Engineering

8. Do you have any areas where you restrict access to site inspectors? If so, what are they and why?

NA

Comments:

II. Financial

1. Which form of management does the firm operate under:

☒ Municipality
☒ Proprietorship
☐ Corporation

☐ Limited Partnership
☐ Other Partnership
☐ Other

2. What is the firm's Dun & Bradstreet number?

Parent _____ Facility _____
Please attach the D&B report(s).

3. If management is partnership, list the names and addresses, of all partners both general and limited.

NA

4. Attach annual report with certified financial statements. NA

5. Attach SEC Form 10K (only applicable in a publicly owned corporation). NA

6. Attach a copy of the following: (if available) NA

a. The documentation submitted to the EPA Regional Administrator (RA) or the State as evidence of satisfying the EPA financial assurance mechanism for liability insurance and closure (and post-closure, if applicable) of facilities who are regulated under RCRA;

b. A letter sent to the RA or the State signed by the chief financial officer that includes required data from the independently audited, year-end financial statement;

c. An independent CPA's report on examination of the financial statements for the last completed fiscal year; and

d. A special report from the owner's or operator's independent CPA to the owner or operator stating that: 1) the accountant has compared the data with the letter from the chief financial officer specified as having been derived from the independently audited, year-end financial statements for the latest fiscal year with the amounts in such financial statements, and 2) no matters came to his attention which caused him to believe that the specified data should be adjusted.

7. Attach a copy of the company's standard waste disposal contract.

NA

8. What is the firm's policy on indemnification by the parent corporation for acts of individual sites/subsidiaries?

NA

9. What is the firm's current bond rating (only applicable in publicly-owned corporation)?

NA

Standard & Poors: _____ Moody's: _____

10. Does the site have general liability or environmental impairment insurance? YES NA NO General liability only

For both policies: _____

a. Who is the carrier? _____

b. How long has the policy been in place? _____

c. Has any claim been made against the policy? YES _____ NO _____

d. By whom, when, and nature of claims?

e. What are the policy limits? (e.g., \$3 million per occurrence and \$6 million annual aggregate)

f. What were the policy limits for the three previous years?

12. Have any insurance policies been terminated, cancelled, or refused renewal by any of the insurance carriers? YES _____ NO _____

Please explain:

13. Provide copies of certificates of insurance.

14. Did any insurance carrier have an independent engineering/risk assessment audit performed before issuing any of the insurance policies listed above? YES _____ NO _____

If yes, please provide us with a copy of this report?

III. Administrative

1. Please describe the facility's management chain-of-command or attach an organization chart.

F.S. Doyle

2. Please describe the background/experience/training of the facility's management. Include at a minimum the facility's general manager, sales director, technical director and laboratory director. If available, attaching resumes is sufficient.

NK

3. How many employees are there and what is the breakdown by department?

F. J. Doyle,
Son - Gary Doyle
Son - H. Law.

(b) (6)

4. For the past three (3) years, please provide the total number of full-time and part-time (each) employees at the start of each year by major departments (e.g., sales, lab, technical, and office). Any consistent accounting year is satisfactory.

5. What is the annual employee turnover rate for the past three years?

6. Please provide the names and telephone numbers of the person(s) responsible for each of the following:

a. General Manager:

F. S. Doyle

b. Technical Operations:

c. Sales/Marketing:

d. Laboratory/Quality Control:

e. Permits/Regulatory Compliance:

(1) Environmental:

(2) DOT:

(3) OSHA:

f. Security:

g. Emergency Response:

h. Personnel Training:

Comments:

IV. Regulatory

1. What is your EPA RCRA I.D. No.? None

2. Please list all applicable permits from federal, state, or municipal authorities governing discharges into water or air, and treatment, storage, and disposal, or transport of wastes. Attach copies.

Please send a copy of the RCRA Part A permit application and a copy of the General Facility Description section from the Part B application.

Mr. Doyle had obtained an air permit from TACB to operate his Bayco AB12 oven. He said that TACB called & told him that he did not need a permit anymore due to the size of his oven. The oven is used to burn paper, etc. off of mostly copper coils from inside refineries. The ash is disposed on his farm. Generators maybe 2, 55 gal. drums / yr.

3. Provide names and telephone numbers of the environmental regulatory officials, from each of the permit agencies above, with whom the facility's management deal. Include both an enforcement/inspection, and a permit writer/reviewer from each agency.

Mr. Doyle had virtually no records. He said that EPA came out 2-3 yrs ago & collected samples around his home & business. He did not get their names or the results of the testing, which he was informed, showed no contamination.

TACB George Ibarra 817-732-5531

Engineering Specialist

6421 Camp Bowie Blvd. Suite 512

Ft. Worth, TX. 76116

4. Has the facility or any of its employees been charged with non-compliance of any permit or had any fine or penalty imposed within the last three (3) years?

Attach copies, or state whether copies will be made available, of any notices relating to any past or present violations, fines, or pending or alleged non-compliance activities.

1. Has the facility or any of its employees been charged with non-compliance of any permit or had any fine or penalty imposed within the last three (3) years?

5. Have there been any allegations of violations made against the facility or its employees? If so, attach copies of allegations or explain below.

1. Have there been any allegations of violations made against the facility or its employees? If so, attach copies of allegations or explain below.

5. Provide a summary of all past (last ten (10) years), current or pending environmental litigation involving the facility, its employees or its parent organization. In preparing this summary, please answer the following:

- a. Are there any previous, current or pending lawsuits against the firm alleging its responsibility for environmental damage to persons, property, or natural resources? YES _____ NO ☒

If so, what are the known details of this litigation?

6. Are there any past, current or pending regulatory actions by federal, state, or local environmental officials that allege the firm's non-compliance with existing environmental regulations, or would require the firm to monitor and/or clean up an existing or ongoing contamination problem? YES _____ NO ☒

If so, what are the known details?

7. Are there any existing on-site or off-site contamination problems (of air, soils, surface or ground water) related to the corporation's activities of which the firm is currently aware, or is in the process of investigating? Yes _____ NO ☒

If so, what are the known details?

8. Have any officers or directors of the facility or its parent corporation been convicted of any state or federal securities violations? YES NO

If so, explain.

3. Please provide five (5) references (name, affiliation, telephone number) of persons familiar with the operation of your facility at least three (3) of which are other operators who use the facility.

Comments:

These references are listed on the back of this page. The references are as follows: (1) [Name], [Address], [City], [State], [Zip]; (2) [Name], [Address], [City], [State], [Zip]; (3) [Name], [Address], [City], [State], [Zip]; (4) [Name], [Address], [City], [State], [Zip]; (5) [Name], [Address], [City], [State], [Zip].

These references are listed on the back of this page. The references are as follows: (1) [Name], [Address], [City], [State], [Zip]; (2) [Name], [Address], [City], [State], [Zip]; (3) [Name], [Address], [City], [State], [Zip]; (4) [Name], [Address], [City], [State], [Zip]; (5) [Name], [Address], [City], [State], [Zip].

V. Community Relations: Do you maintain any relationship with any community organization or facility?

1. What is the name of the newspaper(s) that generally covers the facility?

Sherman Democrat

2. Please provide five (5) references (name, affiliation, telephone) familiar with the operation of your facility, at least three (3) of which are waste generators who use the facility.

a. Louisiana Power & Light

b. Yazoo Valley Electric Power (Mississippi)

c.

d.

e.

3. Please identify at least two (2) of the local emergency response teams (e.g., fire, police, hospital), with the name and telephone of a contact at that organization.

a. Leonard Vol. Fire Dept

b. Leonard Police Dept

other

4. Please identify at least three (3) local officials (elected or appointed), preferably one with general authority (e.g., mayor, selectman, town council members, etc.) and one or more with specific regulatory responsibilities (e.g., zoning board or wetlands commission member, health officer, etc.). Include telephone numbers.

a. Darin Ales - Public Works Director (214) 587-3334

b. Louie Brown City Administrator (214) 587-3334

Comments:

Billy Harold Martin - mayor

VI. Facility Description

1. General

- a. Location: (Show site boundaries on a USGS map) See 1984 map
- b. Size:
- (1) Total acreage _____
 - (2) Acreage dedicated to waste treatment/disposal _____
 - (3) Acreage vacant but available for waste treatment/disposal _____
- c. Method of waste delivery _____
- d. Describe former activities on-site (if any) _____
- e. What wastes are received for treatment/disposal? (Complete attached Table I)
- f. What wastes are specifically not handled by this facility, although they may not be excluded under the permit to operate?
- g. What are hours of operation? _____
- h. How is site access controlled (e.g., describe receiving procedures security fences/barriers, identification of persons entering, etc.)
- i. What is the projected site life? _____

2. Waste Storage

a. Above-ground Tanks

- (1) Complete Table II regarding number, size, contents, material, design, etc. of tanks.
Attach copy of SPOC plan.
- (2) Describe distribution system from receiving point(s) to tanks.

TABLE I

General Types of Materials Received

WASTE TYPE	DRUMS OR CONTAINERS	PHYSICAL STATE			MAJOR CUSTOMER (if any)
		LIQUID	SLUDGES	SOLIDS	
Domestic Solid Waste					
Flammable/Combustible					
Heavy Metals					
Biocides					
Acids					
Bases					
Biological					
Oxidizers					
Water Reactives					
Air Reactives					
Persistent Organics					
Infectious					
Asbestos					
Heavy Oil					
PCB's					
Other					

PLACE "X" IN APPROPRIATE BOXES

TABLE II

Above-Ground Tank Storage Information

TANK ID	CAPACITY (gal)	CONTENTS	MATERIAL OF CONSTRUCTION	SPILL CONTAINMENT			AGE
				TYPE	VOLUME	LINER MAT'L	
1	500	oil	steel	Controlle	uncont	leak	1984
2	500			eye		leak	1984
3	500			eye		leak	1984
4							
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100							

Is piping underground? If so, what percentage of piping is underground?

If yes, how often and how is it tested?

Fail safe interlocks?

- (3) Describe distribution system from tanks to ultimate disposal treatment.

Is piping underground? If so, what percentage of piping is underground?

If yes, how often and how is it tested?

Fail safe interlocks?

Waste Feed Shut-off?

- (4) Are tanks vented through scrubbers or vapor recovery systems?

- (5) What is the ultimate destination of the rain water runoff in the outdoor tank area?

b. Underground Tanks

- (1) Complete Table III regarding number, size, material, age, design, etc. of tanks.

- (2) Identify secondary containment where appropriate.

- (3) How often, and how are tanks integrity tested?

- (4) Describe distribution system from receiving point(s) to tanks.

Is piping underground? If so, what percentage of piping is underground?

If yes, how often and how is it integrity tested?

Fail safe interlocks? _____

- (5) Describe distribution system from tanks to ultimate disposal or treatment. _____

Is piping underground? _____

If yes, how often and how is it tested? _____

Fail safe interlocks? _____

- (6) Are tanks vented through scrubbers or vapor recovery systems? _____

c. Container/Drum Storage (include portable tanks)

- (1) Maximum area dedicated to container/drum storage. 150 x 100

- (2) Design of container/drum storage area:

- (a) Covered? no
(b) Impermeable base? no
(c) Diked? no
(d) Segregated areas for incompatible materials? NA

- (3) Estimated current number of containers/drums in storage on-site 32 barrels of brass, 12 barrels of aluminum, 1 left

- (4) Are there warehousing or staging areas off-site? If so, what is the address? Several hundred ft from yard

- (b) What percentage of overall container/drum storage is at this site? all

- (c) Site permit or EPA I.D. Number for storage. NA

- (d) Are any of the containers/drums stored for more than ninety days? If so, what percentage of the containers/drums are stored for longer than ninety days? NA

d. Lagoons or Impoundments

- (1) Complete Table IV regarding number, size, contents, design, etc. of lagoons/impoundments. NA

TABLE III

Underground Tank Storage Information

TANK ID	CAPACITY (gal)	CONTENTS	MATERIAL	CORROSION PROTECTION		AGE
				COATING	CATHODIC SYSTEM	

(2) How is ground water monitored in vicinity of the lagoon/impoundment?

e. Waste Storage Piles (for each) *NA*

- (1) Number _____
- (2) Contents _____
- (3) Volume _____
- (4) Base material type _____ Thickness _____
Permeability _____
- (5) Runoff control system _____

f. Landfills (for each) *NA*

- (1) Area of active landfill _____
Available capacity _____
- (2) Area of proposed landfill _____
- (3) Area of closed landfills _____
- (4) Waste types and quantity: _____
Active _____
Past _____
- (5) Are materials fixed or stabilized before landfilling? _____
Describe materials and process _____

- (6) Liner specifications (each) _____

- (7) Leachate detection and collection systems (each) _____

- (8) How do you dispose of leachate _____
- (9) Thickness and type of cover material (intermediate and final) _____

Lagoon/Impoundment Information

000040

(10) Is there ground water monitoring around the perimeter of the landfill?

(11) Are on-site disposal contracts carried out under long-term contract or on a lot-by-lot basis? Describe arrangements:

g. Surface water control

For each storage area and type, describe run-off/run-on control and methods of testing and treating collected liquids.

3. Waste Treatment

a. Does the site have the following processing capabilities?

Type	Capacity
Oil Recycling	
Solvent Reclamation	
Oil/Water Separation	
Acid/Base Neutralization	
Cyanide Destruction	
Sludge-Dewatering	
Sludge-Stabilization	

b. For each process, what is done with the following?

Recoverable products See serial - it is sent to the local health department for testing and disposal

Liquid residuals See serial - it is sent to the local health department for testing and disposal

Sludge or solid residuals are disposed of at the site (10)

c. What is the average length of time between the receiving of the waste and the processing? _____

d. What is the site's main waste treatment process? _____

4. Waste Destruction

a. Incineration

(1) Type _____

(2) Capacity _____

(3) Materials Handled _____

(4) Destruction Efficiency _____

(5) Scrubber Efficiency _____

(6) Emission Rates _____

(7) Waste Feed Limits (set by RCRA permit) _____

(8) Has dispersion modeling been conducted for the point source? _____

(9) Fate of scrubber sludge or solid residuals _____

(10) Fate of incineration solid residuals _____

b. Other destruction capacity

Describe process capacity and fate of residuals: _____

5. Waste Bulking and Transshipment (repackaging for shipment)

a. Are wastes collected at the site for treatment elsewhere? _____

b. Describe type of wastes and any bulking process. _____

c. Is off-site treatment carried out on a long-term contract or lot-by-lot basis? _____

Describe arrangements. _____

d. Identify off-site treatment facilities by waste type. _____

6. Electric Equipment Rebuilding and Salvaging

a. What is the disposal procedure for the waste oil? Include data about the disposal site. Scrap oil, Salts, OK

b. What is the disposal procedure for the scrap metal? McKinney Scrap, some x time are sold to
rewinders for reuse.

c. How is the oil stored while on site? 3 ASTs
2-500s + 1-275

d. What are the special handling procedures (if any) for the oil? _____

7. PCB processing (optional-to be filled out by PCB disposers only) NA

a. What means of processing is used at this site for the materials (oils, waste metals, etc.) contaminated with PCB's (polychlorinated biphenyl's)?

Type	Yearly amount (in lbs, gallons, etc) PCB contaminated material processed
Land filling	
Oil recycling	
Incineration	
Other means of destruction	

- b. List any previous processing practices that are different than those above.
- c. How long has this site processed PCB's?
- d. Attach the site's federal, state, or local permits which regulate the PCB processing at the site.
- e. How is the PCB contaminated material transported to the site?
- f. Attach the transporter's federal, state, or local permit for transporting PCB's (if available).
- g. What is the average length of time between the receiving the PCB contaminated materials and their processing?
- h. Are there any by-products (e.g., air emissions, residues, etc.) generated by the processing of PCB contaminated materials? If so, indicate the engineering controls used to limit any exposure that may occur.

3. Employee Training at a RCRA Regulated Site

- a. What specialized training is provided to the employees who will be handling hazardous wastes?
- b. Who provides the training?
- c. What are the instructor's qualifications?
- d. How is the employee comprehension of the training measured?
- e. What training are the employees given in the wearing of a respirator?
- f. What manner of respirator fit testing is provided for the employees handling the hazardous wastes?

VII. Employee Training (Job)

1. Initial Training:

a. Upon first employment, what training is provided to the new employee? _____

b. Who is the instructor? _____

What is the instructor's qualifications? _____

c. How is previous employee training verified? _____

d. What on-the-job training is provided? _____

Who is responsible for the on-the-job training? _____

e. How is the comprehension of the training by the employee measured? (e.g., classroom testing, supervisor's reports, etc.) _____

2. Employee Retraining and Updating:

a. What additional training is provided to employees after the initial training? (e.g., regulation updates, new safety equipment) _____

b. Who is the instructor? _____

What are the instructor's qualifications? _____

c. How is the comprehension of the training by the employee measured? (e.g., classroom testing, supervisor's reports, etc.) _____

b. 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844

1. Land Use:

- SA 61-1989-Sub E-1

Type?

- Direction to concentrations?

Population within 3 miles?

Direction to concentrations?

- Type?**

Distance?

- (1) Name

(2) Distance

(3) 7-day 10-yr. low flow

(4) Water quality classification

(5). Uses. 1. For the purpose of the...

- (1) Name

(2) Distance

(3). Population served

(4) Other downstream data

- (1) . Name

(2) ~~Distance~~

(3) Volume

(4) Water quality classification

(5) Uše

○ All same as 1989 as 2A

d. Flooding

- (1) Is any part of the facility located within the 100-year flood plain or a coastal high hazard zone? _____
- (2) If yes, describe flood protection for active and inactive areas - _____

- (3) Has the site sustained any past flood damage? _____
Describe _____

e. Monitoring

- (1) Is surface water monitored at the facility? _____
- (2) If yes, describe location and parameters used. _____

3. Ground Water:

- a. Depth to water table? _____
- b. Depth to usable aquifer? _____ Name _____
- c. Distance to nearest down gradient high capacity well? _____
What is the well used for? _____
- d. Distance to nearest low capacity well (domestic)? _____
- e. Is site in an aquifer recharge zone? _____
- f. Surficial material at site?
Type? _____ Thickness? _____
- g. Impermeable layers - formation name _____
Depth _____ Material; _____
Thickness _____ (for each)
- h. Aquifers - Formation Name _____
Depth _____ Material; _____
Thickness _____ Usage _____ (for each)

i. Within 3 miles of the site has there been:

(1) extensive ground water use for a long period of time? yes

(2) oil or mineral borings? none

j. Has ground water modeling been carried out for the site? no (1)

If yes, Title of Report and Author none

k. Describe the general geohydrologic setting see attached (2)

l. Ground Water monitoring see attached

Number of Wells 1

Frequency of Monitoring 1

Parameters Monitored 1

IX. Source Information

1. Air

a. Identify potential sources of airborne emissions associated with the site

(1) Point sources:

Incinerators _____

Scrubbers _____

Vents _____

Tank Vents _____

(2) Fugitive:

Storage piles _____

Lagoons _____

Building Vents _____

b. Identify and quantify control technology for each source: None

c. Does the site have federal, state or local air emission permits or licenses? NA If yes, please list all permits and licenses by source and include permit numbers and permissible emission guidelines.

Source

Permit or
License No.

Permissible
Emissions

Mr. Doyle said that the TCEB notified him that a permit was no longer required for his oven. He did not have this in writing.

d. Does the site meet its permit emissions standards? _____ If no, please identify the emission standard(s) not being met and indicate engineering controls (if any) being undertaken to control the contaminant(s).

Save () 1989 0204

e. Identify control technology for each source. _____

f. Has air dispersion modeling been done for routine and emergency conditions? _____

If yes, please provide report. _____

2. Water

a. Identify sources of waste water originating at the site.

b. Identify approximate volume from each source and major chemical constituents or properties.

c. Identify the fate of each stream.

(1) Small volumes collected on drums or tanks for off-site treatment. Identify ultimate disposal.

(2) If wastewater is conveyed by sewer to on-site or off-site treatment/disposal, Identify:

(a) Ownership of sewer (municipal or client)

(b) Age and construction material of sewer system

(c) Has integrity of sewer system been checked within last 3 years? If yes, when, how, and results.

(d) Does the site meet its effluent guidelines? NA If no, please identify the effluent guideline not being met and indicate engineering controls (if any) being undertaken to control the contaminant(s).

(e) Does the site have federal, state or local waste water discharge permits or licenses? no If yes, please list all permits and licenses for each outfall and include permit numbers and effluent guidelines.

<u>Outfall</u>	<u>Permit or License No.</u>	<u>Effluent Guidelines</u>
----------------	----------------------------------	--------------------------------

3. Laboratory

a. Are there on-site analytical capabilities? If yes, complete the next sections for that lab. If no, complete the next sections for the lab that does the analyses.

b. List of major analytical equipment (e.g., G/C, A/A, etc.)

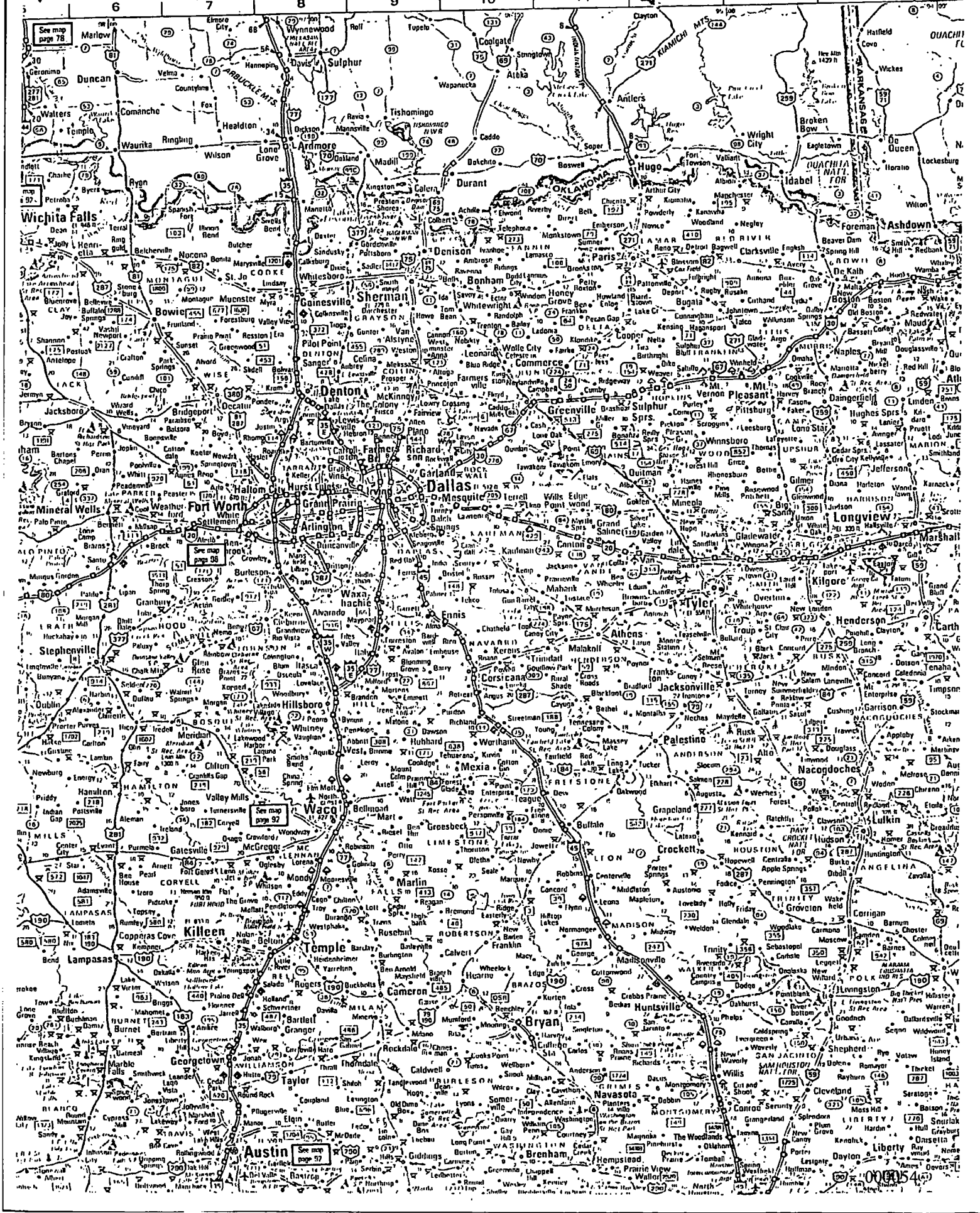
c. Types of analyses performed by the lab (e.g., GC, AA, etc.)

d. Qualifications of the lab director and chemists _____

e. Describe chain of custody procedure and attach a copy of the form.

f. What laboratory does the analytical certification? _____

600 565 - 160 miles



✓ 1/3ugg - to + 12

SOUTHWESTERN ELECTRIC POWER COMPANY
A Member of the Central and South West System

FOR COMPANY BUSINESS ONLY

SUBJECT: SCRAP TRANSFORMERS

DATE: MAY 6, 1991

COMPANY WIDE

FROM: A. M. SMOAK

417

EXT.

G. O. ENGR.

DEPT.

RM. 424

LOCATION/ROOM

TO: MIKE JONES

PURCHASING

DEPT.

RM. 1015M

LOCATION/ROOM

Please prepare a bid request for scrap transformers generated by SWEPCO. The present contract with F. J. Doyle scrap metal expires May 31, 1991.

I am including a revised copy of the bid letter from 1989, a suggested bidders list and a blank contract (M 91) to be included with each bid request. I recommend that the contract be for one year with an option to extend for an additional year. Once the successful bidder is selected, an environmental audit of that facility might be required to ensure that materials are handled in an environmentally sound manner. Note that Yaffee Iron & Metal Company, Inc. was not included on the bidders list because of problems found during an environmental assessment visit in 1989 by Bruce Wright.

am Smoak

jsg

Enclosures

c: J. C. ALLEN
BRIAN BOND
CHRISTY GREEN
J. WARD MARTAINDALE

5/8/91

*I ASKED MALCOM TO CHECK
WHETHER THEY WERE STILL
INTERESTED IN HAVING ME
VISIT ROLLINS OR ANY OTHER
SITES IN AREA IN THE LAST
WEEK OF MAY - IF SO I'D
MAKE TRAVEL ARRANGEMENTS.
HE SAID HE THOUGHT SO BUT
WOULD CHECK WITH WARD.*

(Signature)



CERTIFICATE OF INSURANCE

ISSUE DATE (MM/DD/YY)
050289

PRODUCER

J.L. Green Insurance Agency
3914 Wesley St.
Greenville, Texas 75401

214-455-7784

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

COMPANIES AFFORDING COVERAGE

COMPANY
LETTER

A Old American County Mutual

COMPANY
LETTER

B Ohio Casualty Insurance Company

COMPANY
LETTER

C

COMPANY
LETTER

D

COMPANY
LETTER

E

INSURED

F. J. Doyle
P.O. Box 312
Leonard, Texas 75454

COVERAGES

THIS IS TO CERTIFY THAT POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS, AND CONDITIONS OF SUCH POLICIES.

CO LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIABILITY LIMITS IN THOUSANDS		
						EACH OCCURRENCE	AGGREGATE
B	GENERAL LIABILITY	Application	5-1-89	5-1-90	BODILY INJURY	\$	\$
	<input type="checkbox"/> COMPREHENSIVE FORM				PROPERTY DAMAGE	\$	\$
	<input checked="" type="checkbox"/> PREMISES/OPERATIONS UNDERGROUND EXPLOSION & COLLAPSE HAZARD PRODUCTS/COMPLETED OPERATIONS				BI & PD COMBINED	\$ 500	\$ 500
	<input type="checkbox"/> CONTRACTUAL				PERSONAL INJURY		\$
	<input type="checkbox"/> INDEPENDENT CONTRACTORS						
	<input type="checkbox"/> BROAD FORM PROPERTY DAMAGE						
	<input type="checkbox"/> PERSONAL INJURY						
A	AUTOMOBILE LIABILITY	BP 100334	3.10-89	3-10-90	BODILY INJURY (PER PERSON)	\$	
	<input type="checkbox"/> ANY AUTO				BODILY INJURY (PER ACCIDENT)	\$	
	<input checked="" type="checkbox"/> ALL OWNED AUTOS (OTHER THAN PRIV. PASS.)				PROPERTY DAMAGE	\$	
	<input type="checkbox"/> HIRED AUTOS				BI & PD COMBINED	\$ 500	
	<input type="checkbox"/> NON-OWNED AUTOS						
	GARAGE LIABILITY						
	EXCESS LIABILITY				BI & PD COMBINED	\$	\$
	<input type="checkbox"/> UMBRELLA FORM						
	<input type="checkbox"/> OTHER THAN UMBRELLA FORM						
	WORKERS' COMPENSATION AND EMPLOYERS' LIABILITY				STATUTORY		
					\$	(EACH ACCIDENT)	
					\$	(DISEASE-POLICY LIMIT)	
					\$	(DISEASE-EACH EMPLOYEE)	
	OTHER						

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS

CERTIFICATE HOLDER

SWEPCO
P.O. Box 21106
Shreveport, Louisiana 71156

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 10 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE

J.L. Green Insurance Agency 000056

This Agreement made and entered into by and between SOUTHWESTERN ELECTRIC POWER COMPANY, a DELAWARE CORPORATION, party of the first part, hereinafter called "COMPANY", and FRANK J. DOYLE
(Name of Organization)
a Corporation authorized to do scrap metal recycling
(Type of Organization) (Type of Business)
in Texas, domiciled at 305 Cottonwood
(State) (Street)
Leonard, Texas, 75452, party of the
(City) (State) (Zip)
second part, operating as a Contractor, hereinafter called the "CONTRACTOR".

WITNESSETH THAT: for and in consideration of the premises and the mutual agreement and undertakings of the parties hereto, the CONTRACTOR agrees to the following terms and conditions:

(1) The CONTRACTOR agrees to furnish all labor, tools, and equipment and to pay all expenses necessary for performing miscellaneous work to include purchasing of scrap transformers to be loaded on trailers furnished by F. J. Doyle

_____ or similar jobs as authorized by the Division Superintendent, G. O. Section Manager, or their designated representative.

(2) The CONTRACTOR shall secure all permits and licenses imposed by law, pay all charges and fees, and give all notices necessary and incident to the due and lawful prosecution of his work. The CONTRACTOR shall also contact other contractors and utilities working in the area where the work is being done and attempt to coordinate his work with theirs.

(3) The CONTRACTOR shall not obligate the COMPANY to make any payments to another party, nor make any promises or representations of any nature to another party for, or in behalf of, the COMPANY without the written approval of the COMPANY.

(4) The CONTRACTOR agrees to provide and install all barricades, warning signs, flashers, etc., that may be required to protect and/or warn the public of open ditches or any other hazard created by the performance of his work.

(5) In consideration of the benefits received under this contract, the CONTRACTOR agrees to indemnify the COMPANY, and its officers, agents and employees, from and against any and all liability, loss or

damage the COMPANY may suffer as the result of any claims, suits, judgments or costs in any way caused by or arising out of the performance of this contract including, but not limited to, claims for death, personal injury or property damage. CONTRACTOR further agrees to hold the COMPANY harmless in the premises not only for all claims, suits, judgments or costs in any way caused by or arising out of the performance of this contract by the CONTRACTOR, or by third persons, but also will hold the COMPANY harmless from any acts or omissions caused directly or indirectly by the COMPANY, its agents or employees, willful and wanton negligence excepted.

(6) The CONTRACTOR expressly agrees that he shall indemnify, defend at his expense and completely hold harmless the COMPANY, its successors and/or assigns, from any and all claims of any type or nature whatsoever for damage to property resulting from any actions or inactions on the part of the CONTRACTOR, including but not limited to any claims for damages to crops, fences, land, waterways, livestock, woodland, buildings or improvements and specifically including any and all environmental claims. For purposes of this indemnification agreement, environmental claims include any and all claims asserted by any person or entity pursuant to any present or future federal, state or municipal laws, statutes, ordinances or regulations in any manner governing or affecting the environment or hazardous substances or wastes. The CONTRACTOR shall immediately assume the defense of such claims upon receipt of notice from the COMPANY.

(7) The CONTRACTOR further agrees to save the COMPANY harmless from the payment of any contribution under the State Unemployment Compensation Act, and CONTRACTOR agrees that if it is subject to the State Unemployment Act, it will make whatever contributions are required under and by virtue of the provision of said Act to the proper authorities. CONTRACTOR shall furnish the COMPANY with proof that the Social Security has been paid and that all of its employees have been paid.

(8) The CONTRACTOR shall furnish evidence that the following insurance requirements have been complied with:

<u>KIND</u>	<u>LIMITS OF LIABILITY</u>
(A) Public Liability	\$500,000
(B) Motor Vehicle Liability	\$500,000

In the event that CONTRACTOR's insurance company undertakes the defense of any suit or claim arising out of this contract on any conditional, restricted or qualified basis, and the COMPANY, in order to properly protect its interests, thus finds it necessary to employ attorneys, investigators, expert witnesses, and do such other things as are reasonably necessary to investigate and/or defend the claim or suit, then, in such event, CONTRACTOR obligates itself to pay all of such cost and expense, including court costs, as may have been reasonably incurred by COMPANY.

(9) Should CONTRACTOR fail to prosecute the work to the satisfaction of the COMPANY or to comply with any of the provisions of this agreement, the COMPANY may terminate this agreement upon twenty-four hours' written notice to the CONTRACTOR.

(10) Payment by the COMPANY to the CONTRACTOR for work herein provided to be done shall be upon the following basis:

(11) It is understood and agreed by and between the parties hereto that the CONTRACTOR herein is an independent CONTRACTOR and not an agent or employee of the COMPANY, that the CONTRACTOR shall employ, direct, control, supervise, manage, discharge and pay his own employees; that the COMPANY shall have no control of, or supervision over, the employees of the CONTRACTOR; that the CONTRACTOR is responsible to the COMPANY only for the furnishing of the proper tools and equipment, adequate crew supervision, and doing of the work called for in the contract in a good and workmanlike manner, and in accordance with the terms of the contract and to the satisfaction of the COMPANY.

(12) Approval by the COMPANY as required by sections of the Agreement shall be interpreted to mean approval by the COMPANY'S Division Superintendent, or his designated representative.

(13) The CONTRACTOR covenants, represents, and warrants:

(a) That all applicable provisions of Executive Order No. 11,246, dated September 24, 1965, the Rules and Regulations promulgated thereunder by the Office of Federal Contract Compliance of the United States Department of Labor, and all applicable requirements of the Equal Employment Opportunities Subchapter of the Civil Rights Act of 1964 and Section 402 of the Vietnam Era Veterans Readjustment Assistance Act of 1974 and Section 503 of the Rehabilitation of 1973 will be fully met and observed in respect to the performance of services covered by this contract;

(B) That it has taken affirmative action to insure that applicants for employment by it and its employees are dealt with without regard to race, color, religion, sex, or national origin.

(13) This contract shall cover request for
Quotation 7292

IN WITNESS WHEREOF: the parties hereto have caused this Agreement to be executed in quadruplicate by their proper officers this the 1st day of May, 1989.

CONTRACTOR:

WITNESS:

Janet Pearson

F. J. Doyle Scrap Metals
BY [Signature] 5/1/89
DATE
TITLE Owner

WITNESS:

SOUTHWESTERN ELECTRIC POWER COMPANY

DIRECTOR-TRANSMISSION & DATE
DISTRIBUTION ENGINEERING

WORK ORDER NO. _____ Distribution
_____ Transmission

CHECKED & APPROVED:

Division Robert Walden Jr & Sons R.A. Balgo
Division [Signature] Paul W. Thompson
Division William J. [Signature]
Insurance [Signature]
Manager, Distribution [Signature]
Engineering & Operations Thom J. Effner
Manager of Environmental Affairs Jay A. Penett



Central and South West Services, Inc.

FOR COMPANY BUSINESS ONLY

SUBJECT: F.J. Doyle Metals

April 10, 1989

TO: Jay Pruett

FROM: Curtis Carter *CKC*

I audited F.J. Doyle Metals on April 7, 1989. The attached file contains the information gained during the site visit.

If you have any questions or need additional information, please call me. Thanks for the opportunity to help.

CKC/bj

Attachment

cc: Chris Bissett
Monty Jasper
Lou Hosek

I. General Information

1. Facility name, mailing address, and telephone number:

F. J. Doyle Scrap Metals
Box 312
Leonard Tx 75452 (214) 587-3342

2. Location/address (if different):

next to 305 Cottonwood
Leonard, Tx

3. Principal contact(s), title(s), and telephone number(s):

F. J. Doyle

4. Type of facility (check all applicable):

- | | |
|--|---|
| a. <input type="checkbox"/> Co-disposal landfill | g. <input type="checkbox"/> Detoxification/chemical treatment |
| b. <input type="checkbox"/> Secure landfill | h. <input type="checkbox"/> Solvent recovery/recycle |
| c. <input type="checkbox"/> Aqueous treatment | i. <input type="checkbox"/> Broker/transshipment/bulk storage |
| d. <input type="checkbox"/> Incineration | j. <input type="checkbox"/> Oil recovery/recycle |
| e. <input type="checkbox"/> Biological treatment | k. <input type="checkbox"/> PCBs >50 ppm accepted at the facility |
| f. <input type="checkbox"/> Solar evaporation | l. <input checked="" type="checkbox"/> Other (describe) <u>metal recycler</u> |

5. List the owners of the facility and their mailing addresses.

F. J. & Mona Doyle
305 Cottonwood
Leonard, Texas 75452

6. If the facility is a subsidiary, what is the name, address, principal contact(s), and telephone number(s) of the parent corporation/organization?

NA

7. List the facility's (and parent's) four digit Standard Industrial Classification (SIC) Code(s), with description(s):

8. Do you have any areas where you restrict access to site inspectors? If so, what are they and why?

NA

Comments:

II. Financial

1. Which form of management does the firm operate under:

<u> </u> Municipality	<u> </u> Limited Partnership
<u> ✓ </u> Proprietorship	<u> </u> Other Partnership
<u> </u> Corporation	<u> </u> Other

2. What is the firm's Dun & Bradstreet number? *NA*

Parent Facility
Please attach the D&B report(s).

3. If management is partnership, list the names and addresses of all partners both general and limited.

NA

4. Attach annual report with certified financial statements. *NA*

5. Attach SEC Form 10K (only applicable in a publicly owned corporation). *NA*

6. Attach a copy of the following: (if available) *NA*

a. The documentation submitted to the EPA Regional Administrator (RA) or the State as evidence of satisfying the EPA financial assurance mechanism for liability insurance and closure (and post-closure, if applicable) of facilities who are regulated under RCRA;

b. A letter sent to the RA or the State signed by the chief financial officer that includes required data from the independently audited, year-end financial statement;

c. An independent CPA's report on examination of the financial statements for the last completed fiscal year; and

d. A special report from the owner's or operator's independent CPA to the owner or operator stating that: 1) the accountant has compared the data with the letter from the chief financial officer specified as having been derived from the independently audited, year-end financial statements for the latest fiscal year with the amounts in such financial statements, and 2) no matters came to his attention which caused him to believe that the specified data should be adjusted.

7. Attach a copy of the company's standard waste disposal contract. *NA*

8. What is the firm's policy on indemnification by the parent corporation for acts of individual sites/subsidiaries?

NA

9. What is the firm's current bond rating (only applicable in publicly-owned corporation)?

NA

Standard & Poors: _____ Moody's: _____

10. Does the site have general liability or environmental impairment insurance? YES ☒ NO ☐ *general liability only*

For both policies:

a. Who is the carrier? _____

b. How long has the policy been in place? _____

c. Has any claim been made against the policy? YES ☐ NO ☐

d. By whom, when, and nature of claims?

e. What are the policy limits? (e.g., \$3 million per occurrence and \$6 million annual aggregate)

f. What were the policy limits for the three previous years?

12. Have any insurance policies been terminated, cancelled or refused renewal by any of the insurance carriers? YES _____ NO _____

Please explain:

13. Provide copies of certificates of insurance.

14. Did any insurance carrier have an independent engineering/risk assessment audit performed before issuing any of the insurance policies listed above? YES _____ NO _____

If yes, please provide us with a copy of this report?

III. Administrative

1. Please describe the facility's management chain-of-command or attach an organization chart.

F J. Doyle

2. Please describe the background/experience/training of the facility's management. Include at a minimum the facility's general manager, sales director, technical director and laboratory director. If available, attaching resumes is sufficient.

NA

3. How many employees are there and what is the breakdown by department?

3 - Doyle, his son and son-in-law

4. For the past three (3) years, please provide the total number of full-time and part-time (each) employees at the start of each year by major departments (e.g., sales, lab, technical, and office). Any consistent accounting year is satisfactory.

3 total

5. What is the annual employee turnover rate for the past three years?

0.

6. Please provide the names and telephone numbers of the person(s) responsible for each of the following:

a. General Manager:

F.J. Doyle

b. Technical Operations:

c. Sales/Marketing:

d. Laboratory/Quality Control:

e. Permits/Regulatory Compliance:

(1) Environmental:

(2) DOT:

(3) OSHA:

f. Security:

g. Emergency Response:

h. Personnel Training:

Comments:

Same as above

IV. Regulatory

1. What is your EPA RCRA I.D. No.? *does not have state or federal #'s*

2. Please list all applicable permits from federal, state, or municipal authorities governing discharges into water or air, and treatment, storage, and disposal, or transport of wastes. Attach copies.

Please send a copy of the RCRA Part A permit application and a copy of the General Facility Description section from the Part B application.

3. Provide names and telephone numbers of the environmental regulatory officials, from each of the permit agencies above, with whom the facility's management deal. Include both an enforcement/inspection and a permit writer/reviewer from each agency.

*Texas Air Control Board
Ft. Worth
(817) 732-5531*

Construction permit #S-18612

Permit site 39-07

4. Has the facility or any of its employees been charged with non-compliance of any permit or had any fine or penalty imposed within the last three (3) years? *no*

Attach copies, or state whether copies will be made available, of any notices relating to any past or present violations, fines, or pending or alleged non-compliance activities.

5. Have there been any allegations of violations made against the facility or its employees? If so, attach copies of allegations or explain below.

previous burning of material to remove insulation

5. Provide a summary of all past (last ten (10) years), current or pending environmental litigation involving the facility, its employees or its parent organization. In preparing this summary, please answer the following:

- a. Are there any previous, current or pending lawsuits against the firm alleging its responsibility for environmental damage to persons, property, or natural resources? YES _____ NO ☒

If so, what are the known details of this litigation?

6. Are there any past, current or pending regulatory actions by federal, state, or local environmental officials that allege the firm's non-compliance with existing environmental regulations, or would require the firm to monitor and/or clean up an existing or ongoing contamination problem? YES _____ NO ☒

If so, what are the known details?

7. Are there any existing on-site or off-site contamination problems (of air, soils, surface or ground water) related to the corporation's activities of which the firm is currently aware, or is in the process of investigating? Yes _____ NO ☒

If so, what are the known details?

8. Have any officers or directors of the facility or its parent corporation been convicted of any state or federal securities violations? YES _____ NO ☒

If so, explain.

Comments:

V. Community Relations

1. What is the name of the newspaper(s) that generally covers the facility? *The Leonard Graphic (weekly)*
Greenville Herald Banner (daily)

2. Please provide five (5) references (name, affiliation, telephone) familiar with the operation of your facility, at least three (3) of which are waste generators who use the facility.

a. *Louisiana Power & Light* ✓

b. *City of Garland* ✓

c. *Public Service of Oklahoma* ✓

d.

e.

3. Please identify at least two (2) of the local emergency response teams (e.g., fire, police, hospital), with the name and telephone of a contact at that organization.

a. *Leonard Volunteer Fire Dept.*

b. *Leonard Police Dept*

other

4. Please identify at least three (3) local officials (elected or appointed), preferably one with general authority (e.g., mayor, selectman, town council members, etc.) and one or more with specific regulatory responsibilities (e.g., zoning board or wetlands commission member, health officer, etc.). Include telephone numbers:

a. *Darvin Nolen - Public Works Director (214) 587-3334*

b. *Lanna Jackson - City Administrator (214) 587-3334*

Comments:

Billy Harold Martin - Mayor

VI. Facility Description

1. General

a. Location: (Show site boundaries on a USGS map)

b. Size:

- (1) Total acreage 100' x 180'
- (2) Acreage dedicated to waste treatment/disposal all
- (3) Acreage vacant but available for waste treatment/disposal

c. Method of waste delivery by Doyle's 18 wheeler

d. Describe former activities on-site (if any) none - vacant lots

e. What wastes are received for treatment/disposal? (Complete attached Table I) drained transformers to be scrapped (< 50 ppm PeB only)

f. What wastes are specifically not handled by this facility, although they may not be excluded under the permit to operate?
Doyle does not accept transformer with ≥ 50 ppm PeB

g. What are hours of operation? function of work load

h. How is site access controlled (e.g., describe receiving procedures security fences/barriers, identification of persons entering, etc.)
wood fence with locked gates

i. What is the projected site life? ∞

2. Waste Storage

a. Above-ground Tanks

- (1) Complete Table II regarding number, size, contents, material, design, etc. of tanks. SPCC plan not required; tank storage
Attach copy of SPCC plan. 4 1600 gallons.
- (2) Describe distribution system from receiving point(s) to tanks.

above ground hose and pump (less than 20' run)

TABLE I

General Types of Materials Received

WASTE TYPE	DRUMS OR CONTAINERS	PHYSICAL STATE			MAJOR CUSTOMER (if any)
		LIQUID	SLUDGES	SOLIDS	
Domestic Solid Waste					
Flammable/Combustible					
Heavy Metals					
Biocides					
Acids					
Bases					
Biological					
Oxidizers					
Water Reactives					
Air Reactives					
Persistent Organics					
Infectious					
Asbestos					
Heavy Oil					
PCB's					
Other					

PLACE "X" IN APPROPRIATE BOXES

Above-Ground Tank Storage Information

[illegible]

Is piping underground? If so, what percentage of piping is underground? no

If yes, how often and how is it tested? _____

Fail safe interlocks? no

- (3) Describe distribution system from tanks to ultimate disposal or treatment. pumped from tanks by Scoggins Oil Sallisaw, Oklahoma

Is piping underground? If so, what percentage of piping is underground? no

If yes, how often and how is it tested? _____

Fail safe interlocks? unknown

Waste Feed Shut-off? unknown

- (4) Are tanks vented through scrubbers or vapor recovery systems? no

- (5) What is the ultimate destination of the rain water runoff in the outdoor tank area? Arnold Creek or unnamed tributary of the Sp. Sulphur R. depending on routing of drainage caused by Railroad and main highway

b. Underground Tanks NA

- (1) Complete Table III regarding number, size, material, age, design, etc. of tanks.

- (2) Identify secondary containment where appropriate _____

- (3) How often, and how are tanks integrity tested? _____

- (4) Describe distribution system from receiving point(s) to tanks.

Is piping underground? If so, what percentage of piping is underground? _____

If yes, how often and how is it integrity tested? _____

Fail safe interlocks? _____

- (5) Describe distribution system from tanks to ultimate disposal or treatment. _____

Is piping underground? _____

If yes, how often and how is it tested? _____

Fail safe interlocks? _____

- (6) Are tanks vented through scrubbers or vapor recovery systems? _____

c. Container/Drum Storage (include portable tanks)

- (1) Maximum area dedicated to container/drum storage. _____
50' x 100'

- (2) Design of container/drum storage area:

(a) Covered? NO

(b) Impermeable base? NO

(c) Diked? NO

(d) Segregated areas for incompatible materials? _____
NA

- (3) Estimated current number of containers/drums in storage on-site 40 drums of scrap; 10 drums of ash/insulators and 50 transformer cons (empty)

- (4) Are there warehousing or staging areas off-site? If so, what is the address? NO

(b) What percentage of overall container/drum storage is at this site? 100%

(c) Site permit or EPA I.D. Number for storage. NA

(d) Are any of the containers/drums stored for more than ninety days? If so, what percentage of the containers/drums are stored for longer than ninety days? NA

d. Lagoons or Impoundments NA

- (1) Complete Table IV regarding number, size, contents, design, etc. of lagoons/impoundments.

TABLE III

Underground Tank Storage Information

TANK ID	CAPACITY (gal)	CONTENTS	MATERIAL	CORROSION PROTECTION		AGE
				COATING	CATHODIC SYSTEM	

(2) How is ground water monitored in vicinity of the lagoon/impoundment?

e. Waste Storage Piles (for each) *NA*

- (1) Number _____
- (2) Contents _____
- (3) Volume _____
- (4) Base material type _____ Thickness _____
Permeability _____
- (5) Runoff control system _____

f. Landfills (for each) *NA*

- (1) Area of active landfill _____
Available capacity _____
- (2) Area of proposed landfill _____
- (3) Area of closed landfills _____
- (4) Waste types and quantity: _____
Active _____
Past _____
- (5) Are materials fixed or stabilized before landfilling? _____
Describe materials and process _____

- (6) Liner specifications (each)

- (7) Leachate detection and collection systems (each)

- (8) How do you dispose of leachate _____
- (9) Thickness and type of cover material (intermediate and final)

TABLE IV

Lagoon/Impoundment Information

[illegible]

(10) Is there ground water monitoring around the perimeter of the landfill? _____

(11) Are on-site disposal contracts carried out under long-term contract or on a lot-by-lot basis? Describe arrangements:

g. Surface water control

For each storage area and type, describe run-off/run-on control and methods of testing and treating collected liquids.

none

3. Waste Treatment NA

a. Does the site have the following processing capabilities?

	<u>Type</u>	<u>Capacity</u>	
Oil Recycling	_____	_____	} <u>NA</u>
Solvent Reclamation	_____	_____	
Oil/Water Separation	_____	_____	
Acid/Base Neutralization	_____	_____	
Cyanide Destruction	_____	_____	
Sludge Dewatering	_____	_____	
Sludge Stabilization	_____	_____	

b. For each process, what is done with the following?

Recoverable products _____

Liquid residuals _____

Sludge or solid residuals _____

c. What is the average length of time between the receiving of the waste and the processing? _____

d. What is the site's main waste treatment process? _____

4. Waste Destruction

a. Incineration

(1) Type _____

(2) Capacity _____

(3) Materials Handled _____

(4) Destruction Efficiency _____

(5) Scrubber Efficiency _____

(6) Emission Rates _____

(7) Waste Feed Limits (set by RCRA permit) _____

(8) Has dispersion modeling been conducted for the point source? _____

(9) Fate of scrubber sludge or solid residuals _____

(10) Fate of incineration solid residuals _____

b. Other destruction capacity

Describe process capacity and fate of residuals. burn-out oven;
ash to son's father-in-law's property for
disposal

5. Waste Bulking and Transhipment (repackaging for shipment) NA

a. Are wastes collected at the site for treatment elsewhere? _____

b. Describe type of wastes and any bulking process. _____

c. Is off-site treatment carried out on a long-term contract or lot-by-lot basis? _____

Describe arrangements. _____

d. Identify off-site treatment facilities by waste type. _____

6. Electric Equipment Rebuilding and Salvaging

a. What is the disposal procedure for the waste oil? Include data about the disposal site. Scoggins Oil Sallisaw, Ok.

b. What is the disposal procedure for the scrap metal?
Sold to various junk companies - mostly to
McKinney Junk Co. McKinney Tx. ash from
burn-out oven to private property land disposal

c. How is the oil stored while on site? in two above ground
tanks

d. What are the special handling procedures (if any) for the oil?
None

7. PCB processing (optional-to be filled out by PCB disposers only) NA

a. What means of processing is used at this site for the materials (oils, waste metals, etc.) contaminated with PCB's (polychlorinated biphenyl's)?

Type	Yearly amount (in lbs, gallons, etc) PCB contaminated material processed
Land filling	
Oil recycling	
Incineration	
Other means of destruction	

b. List any previous processing practices that are different than those above.

c. How long has this site processed PCB's?

d. Attach the site's federal, state, or local permits which regulate the PCB processing at the site.

e. How is the PCB contaminated material transported to the site?

f. Attach the transporter's federal, state, or local permit for transporting PCB's (if available).

g. What is the average length of time between the receiving the PCB contaminated materials and their processing?

h. Are there any by-products (e.g., air emissions, residues, etc.) generated by the processing of PCB contaminated materials? If so, indicate the engineering controls used to limit any exposure that may occur.

VII. Employee Training (Job)

NA

1. Initial Training:

- a. Upon first employment, what training is provided to the new employee? _____

- b. Who is the instructor? _____
What is the instructor's qualifications? _____

- c. How is previous employee training verified? _____

- d. What on-the-job training is provided? _____

Who is responsible for the on-the-job training? _____

- e. How is the comprehension of the training by the employee measured?
(e.g., classroom testing, supervisor's reports, etc.) _____

2. Employee Retraining and Updating:

- a. What additional training is provided to employees after the initial training? (e.g., regulation updates, new safety equipment)

- b. Who is the instructor? _____
What are the instructor's qualifications? _____

- c. How is the comprehension of the training by the employee measured?
(e.g., classroom testing, supervisor's reports, etc.) _____

3. Employee Training at a RCRA Regulated Site

NA

- a. What specialized training is provided to the employees who will be handling hazardous wastes?
- b. Who provides the training?
- c. What are the instructor's qualifications?
- d. How is the employee comprehension of the training measured?
- e. What training are the employees given in the wearing of a respirator?
- f. What manner of respirator fit testing is provided for the employees handling the hazardous wastes?

VIII. Site Characterization:

1. Land Use:

- a. Property use and zoning (provide direction from facility)
residential on 3 sides with High School on one side
- b. Are crops grown on adjacent properties? private gardens
Type? _____
- c. Population within 1 mile? _____
Direction to concentrations? SSW
Population within 3 miles? the entire population of Leonard (= 1500)
Direction to concentrations? SSW
- d. Location of sensitive receptors (schools, hospitals, etc.)
Type? school Direction? E
Distance? 200 ft.
- e. Prevailing wind direction and speed. NA

2. Surface Water:

a. Nearest River or Stream

- (1) Name Arnold Creek or unnamed tributary of So. Sulphur R.
(2) Distance ≈ 1 mi.
(3) 7 day 10-yr. low flow unknown
(4) Water quality classification unclassified
(5) Uses unknown

b. Drinking Water Source

- (1) Name _____
(2) Distance _____
(3) Population served _____
(4) Other downstream data _____

c. Nearest Reservoir/Lake

- (1) Name Lavon (Arnold Cr. drainage)
(2) Distance 17 mi.
(3) Volume 956,500 ac-ft
(4) Water quality classification public water supply
(5) Use _____

- (1) Lake Texarkana (So. Sulphur R. drainage)
(2) 112 mi.
(3) 145,300 ac-ft
(4) public water supply

A-29

d. Flooding

(1) Is any part of the facility located within the 100-year flood plain or a coastal high hazard zone? NO

(2) If yes, describe flood protection for active and inactive areas NA

(3) Has the site sustained any past flood damage? NO
Describe _____

e. Monitoring

(1) Is surface water monitored at the facility? NO

(2) If yes, describe location and parameters used.

3. Ground Water:

a. Depth to water table? _____

b. Depth to usable aquifer? _____ Name _____

c. Distance to nearest down gradient high capacity well? 2 blocks

What is the well used for? municipal water supply (1700' deep)

d. Distance to nearest low capacity well (domestic)? < 2 blocks

e. Is site in an aquifer recharge zone? NO

f. Surficial material at site? Gober Chalk
Type? _____ Thickness? ~ 400'

g. Impermeable layers - formation name _____
Depth _____ Material; _____
Thickness _____ (for each)

h. Aquifers - Formation Name _____
Depth _____ Material; _____
Thickness _____ Usage _____ (for each)

i. Within 3 miles of the site has there been:

(1) extensive ground water use for a long period of time? yes

(2) oil or mineral borings? unknown

j. Has ground water modeling been carried out for the site? NO

If yes, Title of Report and Author _____

k. Describe the general geohydrologic setting _____

l. Ground Water monitoring

Number of Wells NONE

Frequency of Monitoring _____

Parameters Monitored _____

IX. Source Information

1. Air

a. Identify potential sources of airborne emissions associated with the site burn-out oven

(1) Point sources:

Incinerators _____
Scrubbers _____
Vents _____
Tank Vents _____

(2) Fugitive:

Storage piles _____
Lagoons _____
Building Vents _____

b. Identify and quantify control technology for each source. none

c. Does the site have federal, state or local air emission permits or licenses? yes If yes, please list all permits and licenses by source and include permit numbers and permissible emission guidelines.

<u>Source</u>	<u>Permit or License No.</u>	<u>Permissible Emissions</u>
<u>burn-out oven</u>	<u>construction permit</u> <u>#5-18612</u> <u>issued 8-10-88</u>	

d. Does the site meet its permit emissions standards? _____ If no, please identify the emission standard(s) not being met and indicate engineering controls (if any) being undertaken to control the contaminant(s).

Doyle has not request operating permit; however the burn-out oven is in use.

- e. Identify control technology for each source. all material burned must have documentation that it was < 50 ppm PCB; feed to oven must be < 10% combustible material; temperature controls; ash handled in such a manner as not to become air borne.
- f. Has air dispersion modeling been done for routine and emergency conditions? NO
- _____
- _____
- _____

If yes, please provide report.

2. Water

- a. Identify sources of waste water originating at the site. storm water runoff only
- b. Identify approximate volume from each source and major chemical constituents or properties. NA
- c. Identify the fate of each stream.

See VIII (2)(a)

(1) Small volumes collected on drums or tanks for off-site treatment. Identify ultimate disposal.

(2) If wastewater is conveyed by sewer to on-site or off-site treatment/disposal, Identify: NA

(a) Ownership of sewer (municipal or client)

(b) Age and construction material of sewer system

(c) Has integrity of sewer system been checked within last 3 years? If yes, when, how, and results.

NA

(d) Does the site meet its effluent guidelines? ____ If no, please identify the effluent guideline not being met and indicate engineering controls (if any) being undertaken to control the contaminant(s).

NA

(e) Does the site have federal, state or local waste water discharge permits or licenses? NO If yes, please list all permits and licenses for each outfall and include permit numbers and effluent guidelines.

<u>Outfall</u>	<u>Permit or License No.</u>	<u>Effluent Guidelines</u>
----------------	----------------------------------	--------------------------------

3. Laboratory NO lab

a. Are there on-site analytical capabilities? If yes, complete the next sections for that lab. If no, complete the next sections for the lab that does the analyses.

b. List of major analytical equipment (e.g., G/C, A/A, etc.)

c. Types of analyses performed by the lab (e.g., GC, AA, etc.)

d. Qualifications of the lab director and chemists _____

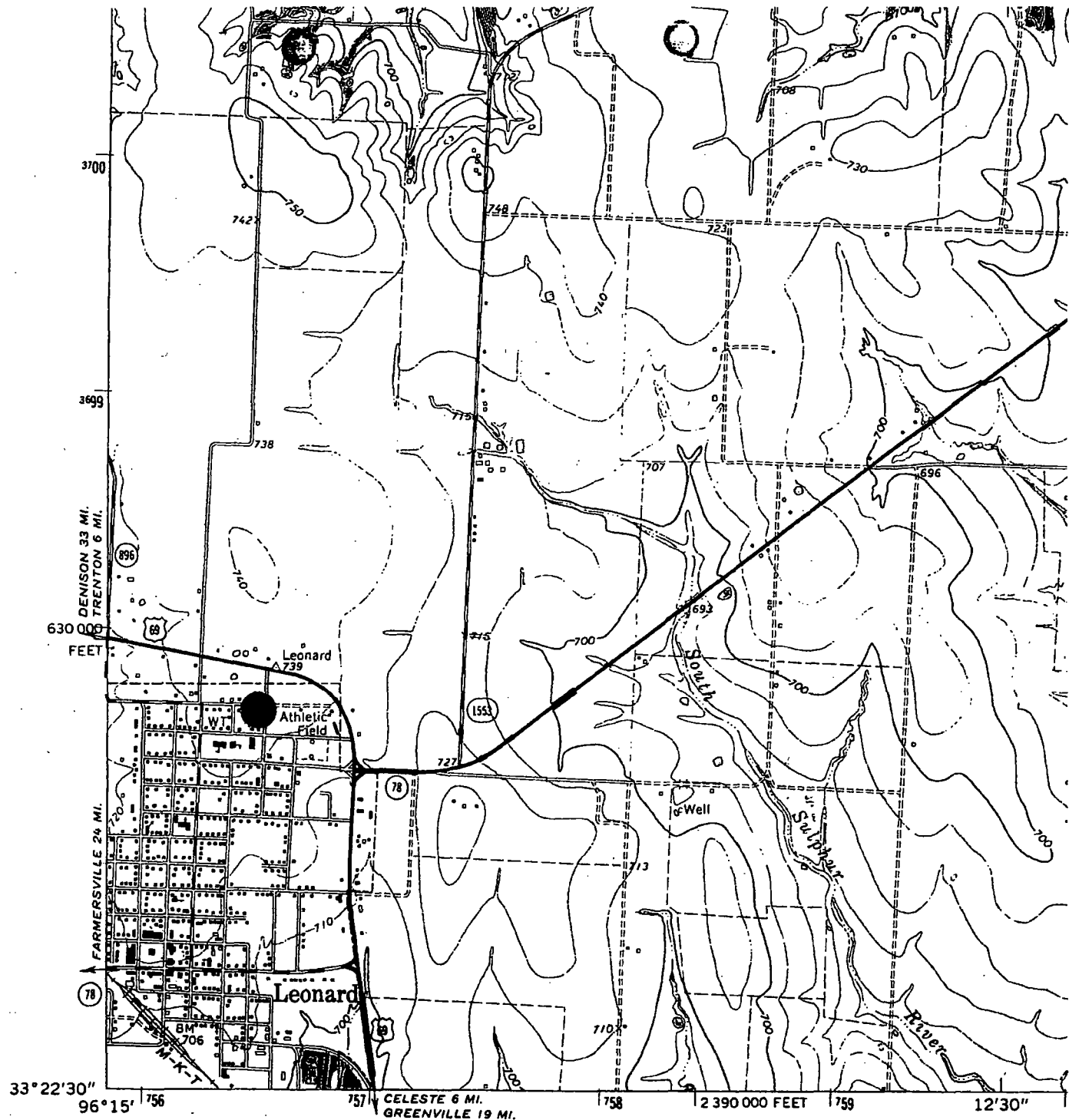
e. Describe chain of custody procedure and attach a copy of the form.

f. What laboratory does the analytical certification? _____

Fannin County Appraisal District: Wylma Dunn (4-7-89)
(214) 583-9546

Owner	Property ID	Current through	Appraised value
Frank J. Doyle	0783-019-0000-02	1988	\$44,430
" "	9030-014-00034-02 *	1988	57,860
" "	9030-014-0005A-02	1988	3,560
" "	9030-014-0007A-02	1988	6,440
" "	9030-013-0005A-02	1988	21,010

* homestead



(PIKE)
6750 IV SE

Mapped, edited, and published by the Geological Survey

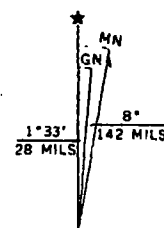
Control by USGS and USC&GS

Topography by photogrammetric methods from aerial photographs taken 1964. Field checked 1964

Polyconic projection. 1927 North American datum
10,000-foot grid based on Texas coordinate system,
north central zone

1000-meter Universal Transverse Mercator grid ticks,
zone 14, shown in blue

Fine red dashed lines indicate selected fence lines



UTM GRID AND 1964 MAGNETIC NORTH
DECLINATION AT CENTER OF SHEET

Leonard, Tx Quad

FOR

000097

new: Transformer Repair Shop.
F. J. Doyle

Southwestern Electric Power Company

FOR COMPANY BUSINESS ONLY

SUBJECT F. J. Doyle Company

DATE July 29, 1986

LOCATION Leonard, Texas

Mr. J. A. Pruett

I spoke with Mr. Doyle today concerning a visit to his company. He welcomes our visit and advises that he is located on Highway 69 approximately 32 miles southeast of Denison, Texas. He also stated that he has purchased transformers from us for many years.

Sincerely,

Robert D. Mabry

Robert D. Mabry

~~10:00 am~~
9:00 am

dmd

xc: R. P. Nix
T. J. Epperson

Doyle - call Tuesday
214/587-3342

100 mi
82

121 North to 635 E - us 75 (Skinner) go north
to McKinney to 121 go N.E.
20 20 to Hwy 69 (Trenton)
go right going east
6 mile Leonard - run over
stop at Exxon (on right)
& call

000098

D

O

F. J. Doyle Transformer
Repair Shop

10-8-86

good odds transformer sold to transformer rewind shop
see references (Drienville, Lone Star)

no outside liquid storage

no oil residue outside

inside no oil spillage

paper into transformer covers + sold

to Las Vegas 3 times/yr, 2 cables

- when advised of CUST reg (non owner gas station)

said "they'd never find us"

- said have had a few minor oil spills in past - school have
cleaned up - said just let rain wash away

ew Transformer Repair
Steps - F. J. Doyle

APPENDIX A
FACILITY QUESTIONNAIRE FORM

NOTICE

The following questionnaire has been designed to be used in conjunction with an inspection of each site being audited. The questionnaire is broad in its approach and the topics covered; those using the questionnaire should, therefore, focus their specific areas of concern by adapting the questionnaire for their own use.

FACILITY QUESTIONNAIRE

INTRODUCTION

We appreciate your cooperation in completing this questionnaire. If you handwrite your responses, please be as legible as possible. If you have already prepared summaries or other documents that answer some of the questions, you can attach them to this form (but please indicate after the question that you have done so and reference the attachment and page number in which the information can be found). Where we ask for quantities or distances, best estimates are acceptable.

Improving this questionnaire is an on-going effort. If you have any recommendations for information that should be added or deleted (or questions rephrased), please give us your comments at the end of the section. Thank you for your cooperation.

Name of person(s) completing this form:

Jay A. Pruett

Title: *Mgr. of Env. Affairs*

Telephone:

Date: *10-8-86*

I. General Information

1. Facility name, mailing address, and telephone number:

F. J. Doyle (Frank)

Box 312

Leonard TX 75452

(214) 587-3342

2. Location/address (if different):

No address

Cottonwood - behind Leonard High School

3. Principal contact(s), title(s), and telephone number(s):

F. J. Doyle

Owner

none

4. Type of facility (check all applicable):

a. ☐ Co-disposal landfill

b. ☐ Secure landfill

c. ☐ Aqueous treatment

d. ☐ Incineration

e. ☐ Biological treatment

f. ☐ Solar evaporation

g. ☐ Detoxification/chemical treatment

h. ☐ Solvent recovery/recycle

i. ☐ Broker/transshipment/bulk storage

j. ☐ Oil recovery/recycle

k. ☐ PCBs >50 ppm accepted at the facility

l. ☒ Other (describe) transformers
regenerators, capacitors, etc. - isolation

5. List the owners of the facility and their mailing addresses.

none

6. If the facility is a subsidiary, what is the name, address, principal contact(s), and telephone number(s) of the parent corporation/organization?

N/A

7. List the facility's (and parent's), four digit Standard Industrial Classification (SIC) Code(s), with description(s):

8. Do you have any areas where you restrict access to site inspectors? If so, what are they and why?

No.

Comments:

II. Financial

1. Which form of management does the firm operate under:

<input type="checkbox"/> Municipality	<input type="checkbox"/> Limited Partnership
<input checked="" type="checkbox"/> Proprietorship	<input type="checkbox"/> Other Partnership
<input type="checkbox"/> Corporation	<input type="checkbox"/> Other

2. What is the firm's Dun & Bradstreet number?

Parent _____ Facility _____
Please attach the D&B report(s).

3. If management is partnership, list the names and addresses of all partners both general and limited.

N/A

4. Attach annual report with certified financial statements. N/A

5. Attach SEC Form 10K (only applicable in a publicly owned corporation). N/A

6. Attach a copy of the following: (if available) N/A

- a. The documentation submitted to the EPA Regional Administrator (RA) or the State as evidence of satisfying the EPA financial assurance mechanism for liability insurance and closure (and post-closure, if applicable) of facilities who are regulated under RCRA;
- b. A letter sent to the RA or the State signed by the chief financial officer that includes required data from the independently audited, year-end financial statement;
- c. An independent CPA's report on examination of the financial statements for the last completed fiscal year; and
- d. A special report from the owner's or operator's independent CPA to the owner or operator stating that: 1) the accountant has compared the data with the letter from the chief financial officer specified as having been derived from the independently audited, year-end financial statements for the latest fiscal year with the amounts in such financial statements, and 2) no matters came to his attention which caused him to believe that the specified data should be adjusted.

7. Attach a copy of the company's standard waste disposal contract.

None

8. What is the firm's policy on indemnification by the parent corporation for acts of individual sites/subsidiaries?

N/A

9. What is the firm's current bond rating (only applicable in publicly-owned corporation)? N/A

Standard & Poors: _____ Moody's: _____

10. Does the site have general liability or environmental impairment insurance? YES _____ NO ☒

For both policies:

a. Who is the carrier? _____

b. How long has the policy been in place? _____

c. Has any claim been made against the policy? YES _____ NO _____

d. By whom, when, and nature of claims?

e. What are the policy limits? (e.g., \$3 million per occurrence and \$6 million annual aggregate)

f. What were the policy limits for the three previous years?

12. Have any insurance policies been terminated, cancelled or refused renewal by any of the insurance carriers? YES _____ NO ✓

Please explain:

13. Provide copies of certificates of insurance. N/A

14. Did any insurance carrier have an independent engineering/risk assessment audit performed before issuing any of the insurance policies listed above? YES _____ NO _____

If yes, please provide us with a copy of this report?

N/A

III. Administrative

1. Please describe the facility's management chain-of-command or attach an organization chart.

F. J. Doyle

no other

2. Please describe the background/experience/training of the facility's management. Include at a minimum the facility's general manager, sales director, technical director and laboratory director. If available, attaching resumes is sufficient.

Jack business 1974

transfomers since '75-'76

began - removing abandon telephone wire

3. How many employees are there and what is the breakdown by department?

One - F. J. Doyle

(Mr. Doyle's father was working this date)

4. For the past three (3) years, please provide the total number of full-time and part-time (each) employees at the start of each year by major departments (e.g., sales, lab, technical, and office). Any consistent accounting year is satisfactory.

Part-time laborer occasionally

5. What is the annual employee turnover rate for the past three years?

see above
none in last year

6. Please provide the names and telephone numbers of the person(s) responsible for each of the following:

a. General Manager:

None - F. J. Doyle.

b. Technical Operations:

c. Sales/Marketing:

d. Laboratory/Quality Control:

e. Permits/Regulatory Compliance:

(1) Environmental:

(2) DOT:

(3) OSHA:

f. Security:

g. Emergency Response:

h. Personnel Training:

Comments:

IV. Regulatory

1. What is your EPA RCRA I.D. No.?

No EPA #

2. Please list all applicable permits from federal, state, or municipal authorities governing discharges into water or air, and treatment, storage, and disposal, or transport of wastes. Attach copies.

No permits - knows of none required

Please send a copy of the RCRA Part A permit application and a copy of the General Facility Description section from the Part B application.

3. Provide names and telephone numbers of the environmental regulatory officials, from each of the permit agencies above, with whom the facility's management deal. Include both an enforcement/inspection and a permit writer/reviewer from each agency.

*Plans to get a furnace to burn insulation
off wire - contact w/ TAES on this
↳ Melvin Lewis*

4. Has the facility or any of its employees been charged with non-compliance of any permit or had any fine or penalty imposed within the last three (3) years? *N.A.*

Attach copies, or state whether copies will be made available, of any notices relating to any past or present violations, fines, or pending or alleged non-compliance activities.

5. Have there been any allegations of violations made against the facility or its employees? If so, attach copies of allegations or explain below.

TACB stopped burning of insulation at different locations - 3 weeks ago.

5. Provide a summary of all past (last ten (10) years), current or pending environmental litigation involving the facility, its employees or its parent organization. In preparing this summary, please answer the following: None

a. Are there any previous, current or pending lawsuits against the firm alleging its responsibility for environmental damage to persons, property, or natural resources? YES _____ NO _____

If so, what are the known details of this litigation?

6. Are there any past, current or pending regulatory actions by federal, state, or local environmental officials that allege the firm's non-compliance with existing environmental regulations, or would require the firm to monitor and/or clean up an existing or ongoing contamination problem? YES _____ NO ✓

If so, what are the known details?

7. Are there any existing on-site or off-site contamination problems (of air, soils, surface or ground water) related to the corporation's activities of which the firm is currently aware, or is in the process of investigating? Yes _____ NO ✓

If so, what are the known details?

8. Have any officers or directors of the facility or its parent corporation been convicted of any state or federal securities violations? YES _____ NO _____

If so, explain.

N/A

Comments:

V. Community Relations

1. What is the name of the newspaper(s) that generally covers the facility?

Leonard Graphic - weekly

2. Please provide five (5) references (name, affiliation, telephone) familiar with the operation of your facility, at least three (3) of which are waste generators who use the facility.

a. *PSO - Rich Shette (918) 599-2218*
Transformer Repair

b. *City of Garland*

Jack Lavender (214) 494-7305

c. *Greenville Transformer (rewinding shop)*
C. Pickens (214) 455-1610

d. *Lone Star Transformer Sales*
Ken Miller (214) 454-2959

e.

3. Please identify at least two (2) of the local emergency response teams (e.g., fire, police, hospital), with the name and telephone of a contact at that organization.

a. *Leonard Volunteer Fire Dept*

b. *Leonard Police Dept*

other

4. Please identify at least three (3) local officials (elected or appointed), preferably one with general authority (e.g., mayor, selectman, town council members, etc.) and one or more with specific regulatory responsibilities (e.g., zoning board or wetlands commission member, health officer, etc.). Include telephone numbers.

a. *Billy Martin - mayor of Leonard*

b.

Comments:

VI. Facility Description

1. General

a. Location: (Show site boundaries on a USGS map)

b. Size:

- (1) Total acreage 2 lots 100' x 155'
(2) Acreage dedicated to waste treatment/disposal all
(3) Acreage vacant but available for waste treatment/disposal none

c. Method of waste delivery truck (mostly self pick up) but occasion 18-wheeler

d. Describe former activities on-site (if any) born w/ horses

e. What wastes are received for treatment/disposal? (Complete attached Table I)

f. What wastes are specifically not handled by this facility, although they may not be excluded under the permit to operate?

Capacitors, PCB-contaminated oil (not licensed)

g. What are hours of operation? whenever

h. How is site access controlled (e.g., describe receiving procedures security fences/barriers, identification of persons entering, etc.)

building locked, no control over yard

i. What is the projected site life? unknown

2. Waste Storage

a. Above-ground Tanks Two tanks

(1) Complete Table II regarding number, size, contents, material, design, etc. of tanks.

Attach copy of SPCC plan.

(2) Describe distribution system from receiving point(s) to tanks.

No distribution system - holding tanks only

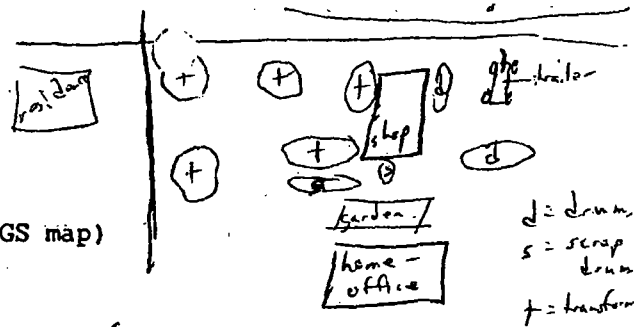


TABLE I

General Types of Materials Received

WASTE TYPE	DRUMS OR CONTAINERS	PHYSICAL STATE			MAJOR CUSTOMER (if any)
		LIQUID	SLUDGES	SOLIDS	
Domestic Solid Waste					
Flammable/Combustible					
Heavy Metals					
Biocides					
Acids					
Bases					
Biological					
Oxidizers					
Water Reactives					
Air Reactives					
Persistent Organics					
Infectious					
Asbestos					
Heavy Oil					
PCB's					
Other <i>Tropfen</i>	<i>Leare</i>			✓	<i>P30 City of Garland</i>

PLACE "X" IN APPROPRIATE BOXES

TABLE II

Above-Ground Tank Storage Information

[illegible]

\$, dirt floor, no curb, no containment

Is piping underground? If so, what percentage of piping is underground? No

If yes, how often and how is it tested? —

Fail safe interlocks? —

- (3) Describe distribution system from tanks to ultimate disposal or treatment. Tank by itself - no such system

Is piping underground? If so, what percentage of piping is underground? N/A

If yes, how often and how is it tested? —

Fail safe interlocks? —

Waste Feed Shut-off? —

- (4) Are tanks vented through scrubbers or vapor recovery systems?

No. Hole in top for filling

- (5) What is the ultimate destination of the rain water runoff in the outdoor tank area? (Inside)

b. Underground Tanks

No underground tanks

- (1) Complete Table III regarding number, size, material, age, design, etc. of tanks.

- (2) Identify secondary containment where appropriate —

- (3) How often, and how are tanks integrity tested? —

- (4) Describe distribution system from receiving point(s) to tanks.

Is piping underground? If so, what percentage of piping is underground? —

If yes, how often and how is it integrity tested? —

Fail safe interlocks? _____

- (5) Describe distribution system from tanks to ultimate disposal or treatment. _____

Is piping underground? _____

If yes, how often and how is it tested? _____

Fail safe interlocks? _____

- (6) Are tanks vented through scrubbers or vapor recovery systems?

c. Container/Drum Storage (include portable tanks)

- (1) Maximum area dedicated to container/drum storage. 2 lots (portion)

- (2) Design of container/drum storage area:

*Drums contain scrap iron, wire,
etc. only. No liquids*

- (a) Covered? No
(b) Impermeable base? No
(c) Diked? No
(d) Segregated areas for incompatible materials? No

- (3) Estimated current number of containers/drums in storage on-site ~30

- (4) Are there warehousing or staging areas off-site? If so, what is the address? No off-site storage

- (b) What percentage of overall container/drum storage is at this site? —

- (c) Site permit or EPA I.D. Number for storage.
—

- (d) Are any of the containers/drums stored for more than ninety days? If so, what percentage of the containers/drums are stored for longer than ninety days? —

d. Lagoons or Impoundments

No ponds or lagoons

- (1) Complete Table IV regarding number, size, contents, design, etc. of lagoons/impoundments.

TABLE III

Underground Tank Storage Information

TANK ID	CAPACITY (gal)	CONTENTS	MATERIAL	CORROSION PROTECTION		AGE
				COATING	CATHODIC SYSTEM	
		N/A - No underground tanks				

(2) How is ground water monitored in vicinity of the lagoon/impoundment?

e. Waste Storage Piles (for each) *No waste storage piles*

(1) Number _____

(2) Contents _____

(3) Volume _____

(4) Base material type _____ Thickness _____

Permeability _____

(5) Runoff control system _____

f. Landfills (for each) *No land fill*

(1) Area of active landfill _____

Available capacity _____

(2) Area of proposed landfill _____

(3) Area of closed landfills _____

(4) Waste types and quantity: _____

Active _____

Past _____

(5) Are materials fixed or stabilized before landfilling? _____

Describe materials and process _____

(6) Liner specifications (each)

(7) Leachate detection and collection systems (each)

(8) How do you dispose of leachate _____

(9) Thickness and type of cover material (intermediate and final)

Lagoon/Impoundment Information

N/A - No ponds

(10) Is there ground water monitoring around the perimeter of the landfill? _____

(11) Are on-site disposal contracts carried out under long-term contract or on a lot-by-lot basis? Describe arrangements:

g. Surface water control

For each storage area and type, describe run-off/run-on control and methods of testing and treating collected liquids.

None

3. Waste Treatment

a. Does the site have the following processing capabilities?

	<u>Type</u>	<u>Capacity</u>
Oil Recycling	_____	_____
Solvent Reclamation	_____	_____
Oil/Water Separation	_____	_____
Acid/Base Neutralization	_____	_____
Cyanide Destruction	_____	_____
Sludge Dewatering	_____	_____
Sludge Stabilization	_____	_____

b. For each process, what is done with the following?

Recoverable products McKinnis Junk Co - McKinnis, TX
- copper, iron, brass, aluminum

Liquid residuals oil - sell to John Scroggins (918) 775-2748
Salina, Okla - picks up all types of oil - "cleaned"

Sludge or solid residuals

No other waste products at all

c. What is the average length of time between the receiving of the waste and the processing? may be a year

d. What is the site's main waste treatment process? tear down of transformers

4. Waste Destruction

a. Incineration

N/A

(1) Type _____

(2) Capacity _____

(3) Materials Handled _____

(4) Destruction Efficiency _____

(5) Scrubber Efficiency _____

(6) Emission Rates _____

(7) Waste Feed Limits (set by RCRA permit) _____

(8) Has dispersion modeling been conducted for the point source? _____

(9) Fate of scrubber sludge or solid residuals _____

(10) Fate of incineration solid residuals _____

b. Other destruction capacity

Describe process capacity and fate of residuals. _____

5. Waste Bulking and Transshipment (repackaging for shipment) N/A

a. Are wastes collected at the site for treatment elsewhere? _____

b. Describe type of wastes and any bulking process. _____

c. Is off-site treatment carried out on a long-term contract or lot-by-lot basis? _____

Describe arrangements. _____

d. Identify off-site treatment facilities by waste type. _____

6. Electric Equipment Rebuilding and Salvaging

a. What is the disposal procedure for the waste oil? Include data about the disposal site. To Scraggins Oil Service - processes for sale as fuel, also as "floor sweep"

b. What is the disposal procedure for the scrap metal? to McKinnon Scrap.

c. How is the oil stored while on site? in two tanks inside

d. What are the special handling procedures (if any) for the oil? none

7. PCB processing (optional-to be filled out by PCB disposers only)

Does not knowingly handle PCB's
a. What means of processing is used at this site for the materials (oils, waste metals, etc.) contaminated with PCB's (polychlorinated biphenyl's)?

Type	Yearly amount (in lbs, gallons, etc) PCB contaminated material processed
Land filling	N/A
Oil recycling	N/A
Incineration	N/A
Other means of destruction	N/A

relies on generators to not send PCB equipment.
Does not believe gets any now.
A-25

wife said they got stuck once in the past for this tho.

- b. List any previous processing practices that are different than those above.

*moved tanks inside
Not burn any more*

- c. How long has this site processed PCB's?
-

- d. Attach the site's federal, state, or local permits which regulate the PCB processing at the site.
-

- e. How is the PCB contaminated material transported to the site?
-

- f. Attach the transporter's federal, state, or local permit for transporting PCB's (if available).
-

- g. What is the average length of time between the receiving the PCB contaminated materials and their processing?
-

- h. Are there any by-products (e.g., air emissions, residues, etc.) generated by the processing of PCB contaminated materials? If so, indicate the engineering controls used to limit any exposure that may occur.
-

VII. Employee Training (Job) *N/A*

1. Initial Training:

a. Upon first employment, what training is provided to the new employee? _____

b. Who is the instructor? _____

What is the instructor's qualifications? _____

c. How is previous employee training verified? _____

d. What on-the-job training is provided? _____

Who is responsible for the on-the-job training? _____

e. How is the comprehension of the training by the employee measured?
(e.g., classroom testing, supervisor's reports, etc.) _____

2. Employee Retraining and Updating: *N/A*

a. What additional training is provided to employees after the initial training? (e.g., regulation updates, new safety equipment)

b. Who is the instructor? _____

What are the instructor's qualifications? _____

c. How is the comprehension of the training by the employee measured?
(e.g., classroom testing, supervisor's reports, etc.) _____

3. Employee Training at RCRA Regulated Site N/A

- a. What specialized training is provided to the employees who will be handling hazardous wastes?
- b. Who provides the training?
- c. What are the instructor's qualifications?
- d. How is the employee comprehension of the training measured?
- e. What training are the employees given in the wearing of a respirator?
- f. What manner of respirator fit testing is provided for the employees handling the hazardous wastes?

VIII. Site Characterization

1. Land Use:

- a. Property use and zoning (provide direction from facility)

~~Don't know~~ residential all around site
complaints from neighbors on aesthetics - wind from
high school across street? No fence or barriers

- b. Are crops grown on adjacent properties?

gardens only

Type? _____

- c. Population within 1 mile?

residential

Direction to concentrations?

all around

Population within 3 miles?

Direction to concentrations?

- d. Location of sensitive receptors (schools, hospitals, etc.)

Type?

high school

Direction?

north

Distance?

across street

- e. Prevailing wind direction and speed.

south

2. Surface Water:

- a. Nearest River or Stream

(1) Name

drainage ditch to unnamed creek

(2) Distance

uns in front of lot

(3) 7 day 10-yr. low flow

(4) Water quality classification

(5) Uses

- b. Drinking Water Source

(1) Name

Leonard Water Supply - wells

(2) Distance

1 block

(3) Population served

1800

(4) Other downstream data

- c. Nearest Reservoir/Lake

(1) Name

(2) Distance

(3) Volume

(4) Water quality classification

(5) Use

d..Flooding

- (1) Is any part of the facility located within the 100-year flood plain or a coastal high hazard zone? Don't think so.
- (2) If yes, describe flood protection for active and inactive areas no flood problem
- (3) Has the site sustained any past flood damage? None

e. Monitoring

- (1) Is surface water monitored at the facility? No
- (2) If yes, describe location and parameters used.

3. Ground Water:

- a. Depth to water table? unknown
- b. Depth to usable aquifer? very deep Name unknown
- c. Distance to nearest down gradient high capacity well? 1 block
What is the well used for? city water supply
- d. Distance to nearest low capacity well (domestic)? —
- e. Is site in an aquifer recharge zone? unknown
- f. Surficial material at site?
Type? unknown Thickness? —
- g. Impermeable layers - formation name unknown
Depth — Material; —
Thickness — (for each)
- h. Aquifers - Formation Name unknown
Depth — Material; —
Thickness — Usage — (for each)

i. Within 3 miles of the site has there been:

(1) extensive ground water use for a long period of time? _____

yes

(2) oil or mineral borings? unknown

j. Has ground water modeling been carried out for the site? _____

No

If yes, Title of Report and Author _____

k. Describe the general geohydrologic setting _____

unknown

l. Ground Water monitoring

Number of Wells None

Frequency of Monitoring _____

Parameters Monitored _____

IX. Source Information

1. Air

a. Identify potential sources of airborne emissions associated with the site

No air emissions since stopped burning 3 weeks ago off-site

(1) Point sources:

Incinerators

Scrubbers

Vents

Tank Vents

Fumes from incineration burning

TAKS (Incineration) (Leakage) (Interstate incineration) (burning material) (looking into)

(2) Fugitive:

None

Storage piles

Lagoons

Building Vents

b. Identify and quantify control technology for each source. *None*

c. Does the site have federal, state or local air emission permits or licenses? *NO* If yes, please list all permits and licenses by source and include permit numbers and permissible emission guidelines.

Source

Permit or License No.

Permissible Emissions

d. Does the site meet its permit emissions standards? *N/A* If no, please identify the emission standard(s) not being met and indicate engineering controls (if any) being undertaken to control the contaminant(s).

e. Identify control technology for each source. _____

f. Has air dispersion modeling been done for routine and emergency conditions? _____

If yes, please provide report.

2. Water

a. Identify sources of waste water originating at the site.

None - stormwater only - uncontrolled

b. Identify approximate volume from each source and major chemical constituents or properties.

c. Identify the fate of each stream.

(1) Small volumes collected on drums or tanks for off-site treatment. Identify ultimate disposal.

N/A

(2) If wastewater is conveyed by sewer to on-site or off-site treatment/disposal, Identify: *N/A*

(a) Ownership of sewer (municipal or client)

(b) Age and construction material of sewer system

(c) Has integrity of sewer system been checked within last 3 years? If yes, when, how, and results.

(d) Does the site meet its effluent guidelines? N/A If no, please identify the effluent guideline not being met and indicate engineering controls (if any) being undertaken to control the contaminant(s).

(e) Does the site have federal, state or local waste water discharge permits or licenses? No If yes, please list all permits and licenses for each outfall and include permit numbers and effluent guidelines.

<u>Outfall</u>	<u>Permit or License No.</u>	<u>Effluent Guidelines</u>
<u>None</u>		

3. Laboratory

a. Are there on-site analytical capabilities? N/A If yes, complete the next sections for that lab. If no, complete the next sections for the lab that does the analyses.

b. List of major analytical equipment (e.g., G/C, A/A, etc.)

N/A

c. Types of analyses performed by the lab (e.g., GC, AA, etc.)

N/A

d. Qualifications of the lab director and chemists _____

e. Describe chain of custody procedure and attach a copy of the form.

f. What laboratory does the analytical certification? _____

Records -

No records of waste-in

Tox records as to who bought from only

SPCC -

- None

PCB
Scrap Transformer Dealers

10/12/1979



XC: *Gay Kmett*
2-16-89

Southwestern Electric Power Company

RECEIVED

P. O. BOX 21106 - SHREVEPORT, LOUISIANA 71156

FEB 14 1989

February 14, 1989

OFFICE OF
J. W. MARTAINDALE

Mr. F.J. Doyle
F.J. Doyle Scrap Metal
P.O. Box 312
Leonard, TX 75452

Dear Mr. Doyle:

You are invited to bid on our Scrap Transformer Program for the period March 15, 1989 through March 15, 1990, with an option year through March 15, 1991.

- 1) QUANTITY - Our volume of scrap transformers is expected to be approximately 800 to 900 units per year. These figures are estimates only.
- 2) SIZE & TYPE - Scrap transformers generally vary in size from 1 kVA to 1,000 kVA, with an occasional larger unit. Most of these units will be pole type transformers, with some 1Ø pad-mounted units and a few 3Ø pad-mounted units.
- 3) LOCATIONS - Scrap transformers will be collected by SWEPCO at the following locations:
 - a) 6130 Union Street
Shreveport, LA 71108
 - b) 1221 Karnes Road
Longview, TX 75604
 - c) 3708 West 7th Street
Texarkana, TX 75501
 - d) 101 W. Township St.
Fayetteville, AR 72703
- 4) CONDITION OF UNITS - All scrap transformers will be drained of oil by SWEPCO prior to shipment to dealers' facilities. Some units may contain residual oil only. Only units tested at less than 50 ppm PCB content will be scrapped.
- 5) DISPOSAL - All transformers shipped to the scrap facility are to be dismantled and processed as scrap material only. No transformers are to be reused or resold intact to another party.
- 6) PRICES - Bids are requested based on the following closing prices as published in American Metal Market:

Refiners Copper Scrap - Light Copper
Brass Ingot Makers Scrap - Yellow Brass Solids
Secondary Smelters' Scrap Aluminum - Mixed Clips
Scrap Iron & Steel - No. 2 heavy melt - St. Louis



Southwestern Electric Power Company

P. O. BOX 21106 - SHREVEPORT, LOUISIANA 71156

February 14, 1989

Mr. Wendell Gathright
Rixey Iron & Metal Company
8033 Old Jacksonville Highway
North Little Rock, AR 72117

Dear Mr. Gathright:

You are invited to bid on our Scrap Transformer Program for the period March 15, 1989 through March 15, 1990, with an option year through March 15, 1991.

- 1) QUANTITY - Our volume of scrap transformers is expected to be approximately 800 to 900 units per year. These figures are estimates only.
- 2) SIZE & TYPE- Scrap transformers generally vary in size from 1 kVA to 1,000 kVA, with an occasional larger unit. Most of these units will be pole type transformers, with some 1Ø pad-mounted units and a few 3Ø pad-mounted units.
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Secondary Smelters' Scrap Aluminum - Mixed Clips
Scrap Iron & Steel - No. 2 heavy melt - St. Louis



Southwestern Electric Power Company

P. O. BOX 21106 - SHREVEPORT, LOUISIANA 71156

February 14, 1989

Mr. Bill Cale
Yaffe Iron & Metal Company, Inc.
P.O. Box 916
Muskogee, OK 74402

Dear Mr. Cale:

You are invited to bid on our Scrap Transformer Program for the period March 15, 1989 through March 15, 1990, with an option year through March 15, 1991.

- 1) QUANTITY - Our volume of scrap transformers is expected to be approximately 800 to 900 units per year. These figures are estimates only.
- 2) SIZE & TYPE - Scrap transformers generally vary in size from 1 kVA to 1,000 kVA, with an occasional larger unit. Most of these units will be pole type transformers, with some 1Ø pad-mounted units and a few 3Ø pad-mounted units.
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Refiners Copper Scrap - Light Copper
Brass Ingot Makers Scrap - Yellow Brass Solids
Secondary Smelters' Scrap Aluminum - Mixed Clips
Scrap Iron & Steel - No. 2 heavy melt - St. Louis

The figures used shall be those published the Monday following the date transformers are picked up.

Optional pricing methods will be considered; however, bids based on these closing prices are also requested to aid with fair evaluations.

- 7) OPTIONAL TRAILERS - As an option, empty flatbed trailers are requested for each location so that units to be scrapped can be loaded on an as needed basis. The dealer will be notified when the trailer is filled. An empty trailer is to be delivered when the filled trailer is picked up. It shall be the responsibility of the dealers driver to secure all units prior to leaving SWEPCO's property.
- 8) PAYMENTS - Payments for all scrap transformers are to be made within thirty (30) days after units are picked up. All payments should be made by check payable to SWEPCO, mailed to Purchasing Department, P.O. Box 21106, Shreveport, LA 71156. The total number of units picked up and the location of the units must be included with the payment.
- 9) CONTRACT - This work will be covered by the enclosed general contract (M-89). Please refer to it for general terms and conditions, insurance requirements, etc.

Bids must be received in SWEPCO's Purchasing Department on or before 2:00 p.m., March 7, 1989, if they are to receive consideration. Please seal you bid in the enclosed envelope and return it to me at the above address.

Bids will be opened privately at 2:00 p.m., March 7, 1989. We reserve the right to reject any and all proposals. If you have any questions, please call me at (318) 222-2141, extension 332 or Ward Martaindale, extension 416.

Sincerely,

Robert D. Mabry

Robert D. Mabry
Assistant Purchasing Agent

smt

Enclosures

cc: H.E. Jennings
J.W. Martaindale ✓
K.G. Lawrence
M.K. Beasley
G.A. Shows
F.D. Jones

Scrap Transformers

7-12-83

Barbara Jacobs

Environmental Conditions:

- permitting transportation & generation of ^{regulated} wastes
- waste disposal
- record keeping

All non-recyclable items generated during the dismantling process shall be disposed of in accordance with ~~permitted~~ ~~local~~ all fed, state & local ~~regulations~~ regulations.

Successful bidder will be subject to a env. audit by SWPCA or CSW. Records of materials received and waste disposed must be maintained & made available for inspection on request.

Ask Al Espinoza & Dave Ruler if they have a contract with scrap dealers.

Call Mikey
" Espinoza
" Duke
" GE Scott?



Southwestern Electric Power Company

P. O. BOX 21106 - SHREVEPORT, LOUISIANA 71156

February 14, 1989

COPY

Mr. F.J. Doyle
F.J. Doyle Scrap Metal
P.O. Box 312
Leonard, TX 75452

Dear Mr. Doyle:

You are invited to bid on our Scrap Transformer Program for the period ~~March 15, 1989 through March 15, 1990~~ with an option year through ~~March 15, 1991~~.

- 1) QUANTITY - Our volume of scrap transformers is expected to be approximately 800 to 900 units per year. These figures are estimates only.
- 2) SIZE & TYPE- Scrap transformers generally vary in size from 1 kVA to 1,000 kVA, with an occasional larger unit. Most of these units will be pole type transformers, with some 1Ø pad-mounted units and a few 3Ø pad-mounted units.
- 3) LOCATIONS - Scrap transformers will be collected by SWEPCO at the following locations:
 - a) 6130 Union Street
Shreveport, LA 71108
 - b) 1221 Karnes Road
Longview, TX 75604
 - c) 3708 West 7th Street
Texarkana, TX 75501
 - d) 101 W. Township St.
Fayetteville, AR 72703
- 4) CONDITION OF UNITS - All scrap transformers will be drained of oil by SWEPCO prior to shipment to dealers' facilities. Some units may contain residual oil only. Only units tested at less than 50 ppm PCB content will be scrapped.
- 5) DISPOSAL - All transformers shipped to the scrap facility are to be dismantled and processed as scrap material only. No transformers are to be reused or resold intact to another party.
- 6) PRICES - Bids are requested based on the following closing prices as published in American Metal Market:

Refiners Copper Scrap - Light Copper
Brass Ingot Makers Scrap - Yellow Brass Solids
Secondary Smelters' Scrap Aluminum - Mixed Clips
Scrap Iron & Steel - No. 2 heavy melt - St. Louis

1 Kva

The figures used shall be those published the Monday following the date transformers are picked up.

Optional pricing methods will be considered; however, bids based on these closing prices are also requested to aid with fair evaluations.

- 7) OPTIONAL TRAILERS - As an option, empty flatbed trailers are requested for each location so that units to be scrapped can be loaded on an as needed basis. The dealer will be notified when the trailer is filled. An empty trailer is to be delivered when the filled trailer is picked up. It shall be the responsibility of the dealers driver to secure all units prior to leaving SWEPCO's property.
- 8) PAYMENTS - Payments for all scrap transformers are to be made within thirty (30) days after units are picked up. All payments should be made by check payable to SWEPCO, mailed to Purchasing Department, P.O. Box 21106, Shreveport, LA 71156. The total number of units picked up and the location of the units must be included with the payment.
- 9) CONTRACT - This work will be covered by the enclosed general contract (M-89). Please refer to it for general terms and conditions, insurance requirements, etc.

Bids must be received in SWEPCO's Purchasing Department on or before 2:00 p.m., ~~March 7, 1989~~^{May 17, 1991}, if they are to receive consideration. Please seal you bid in the enclosed envelope and return it to me at the above address.

Bids will be opened privately at 2:00 p.m., ~~March 7, 1989~~^{May 17, 1991}. We reserve the right to reject any and all proposals. If you have any questions, please call me at (318) 222-2141, extension 332 or ~~Ward Martaindale~~, extension ~~416~~.

MALCOLM SMOAK

417

Sincerely,

Robert D. Mabry

Robert D. Mabry
Assistant Purchasing Agent

smt

Enclosures

cc: H.E. Jennings
J.W. Martaindale
K.G. Lawrence
M.K. Beasley
G.A. Shows
F.D. Jones

SUGGESTED 1991 SCRAP TRANSFORMER BID LIST

check out

Mr. Wendell Gathright
Rixey Iron & Metal Company
8033 Old Jacksonville Highway
North Little Rock, AR 72117

→ Ask Mary Davis if we have a system
credit on them. They bid in 1991

ok Mr. F. J. Doyle
F. J. Doyle Scrap Metal
P. O. Box 312
Leonard, TX 75452

Mr. Steve Pickens
Greenville Transformer Company
P. O. Box 845
Greenville, TX 75401

ok Mr. Dan Smith
Soloman Electric Supply, Inc.
P. O. Box 245
Soloman, KS 67480

Mr. James H. Pinkert
KUROK Corp.
1419 Lake Cook Road, Suite 210
Deerfield, IL 60015

Ms. Paulette Vest
Vest Metals
Route 6, Box 33
Hartselle, AL 35640

Mr. Doug Robinson 1-800-562-6829
Delta-Y Electric Co.

ok P.O. Box 100
Corning, AR 72422

Scott ? GE. Call & ask him if he can refer
us to any scrap steel dealers.

~~General Scrap Contact them~~

ok Mr. Tom Adams
General Scrap Material Co.
P.O. Box 454 200 McNeil St.
Shreveport, LA 71101

RETIRED TRANSFORMERS SOLD TO SCRAP DEALERS

SOUTHERN DIVISION:

- 1976 - Sold to Allen Transformer Company & Interstate Electric Company in Ft. Smith, AR.
- 1977 - Sold to Allen Transformer Company.
Sold to T&R Electric Company, P. O. Box 180, Coleman S. Dakota.
Sold to Interstate Electric Company.
Sold to F. J. Doyle Scrap Metal.
Sold to Rogers Iron & Metal, 730 North Arkansas Ave., Rogers, AR.
- 1978 - Sold to F. J. Doyle Scrap Metal.
Sold to T&R Electric.
- 1979 - Sold to San Angelo Electric Company.
Sold to Soloman Electric Company.
Sold to Southern States Specialty, Inc., San Augustine, TX.
- 1980 - Sold to Soloman Electric Supply Company.
Sold to San Angelo Electric.
- 1981 - Sold to Southwest Electric Company.
Sold to Interstate Electric Company, Ft. Smith, AR.
Sold to Soloman Electric Company.
- 1982 - Sold to San Angelo Electric Company.
Sold to Southwest Electric Company.
Sold to Yaffee Iron & Metal.
- 1983 - Sold to Jerry's Electric Company, Box 636, Clay City, KS.
Sold to Greenville Transformer Company.
Sold to Benton Salvage Company.
Sold to Yaffee Iron & Metal.
Sold to Southwest Power Equipment.
- 1984 - Sold to Pixey Iron & Metal Company.
Sold to Yaffee Iron & Metal Company.
Sold to Dowzer Electric Company - transformers scrapped.
Sold to F. J. Doyle Scrap Metal.
Sold to Southwestern Electric Service Company, Jacksonville, TX.
Sold to Jerry's Electric Company.
Sold to Greenville Transformer Company.
- 1985 - Sold to F. J. Doyle Scrap Metal.
Sold to Benton Salvage, P. O. Box 4047, Little, Rock, AR.
Sold to Jimelco - scrapped transformers.
Sold to Yaffee Iron & Metal Company.
Sold to Dowzer - scrapped transformers.
- 1986 - Sold to Jimelco - scrapped transformers.
Sold to U.S. Transformer, Inc., Jordan, MN 55353.
Sold to F. J. Doyle Scrap Metal.
- 1987 - Sold to Jimelco.
Sold to Ohio Transformer Company.
Sold to T&R Electric Company.
Sold to Jerry's Electric Company, Inc.
- 1988 - Sold to Southwest Electric Company.
- 1989 - Sold to Greenville Transformer Company.
Sold to F. J. Doyle Scrap Metal.
- 1990 - Sold to F. J. Doyle Scrap Metal.

VENDOR KNOWN

WESTERN DIVISION:

YEAR	WORK ORDER NUMBER	VENDOR
1938	7483	Fagin Electric
1939	7574	Fagin Electric
1940	7761	Fagin Electric
1941	7943	Fagin Electric
1941	18012	Fagin Electric
1960	0-6325	J. R. Winthrop
1961	1-6015	Interstate Electric Company
1961	1-6117	J. R. Winthrop
1961	1-6275	Interstate Electric Company
1961	1-6332	Interstate Electric Company
1962	2-6027	Harold Mayes
1963	3-6129	J. R. Winthrop
1963	3-6290	J. R. Winthrop
1964	4-6133	Interstate Electric Company
1965	5-6178	Interstate Electric Company
1965	5-6207	Allen Transformer Company
1966	6-8086	Interstate
1966	6-8122	Interstate
1966	6-6016	Allen Transformer Company
1966	6-6023	Jack Owen
1966	6-6047	Allen Transformer Company
1966	6-6172	Jack Owen
1966	6-6256	Allen Transformer Company
1967	7-6159	Jack Owen
1967	7-6161	Jack Owen
1967	7-6181	Allen Transformer Company
1967	7-6242	Allen Transformer Company
1969	9-6007	Allen Transformer Company
1969	9-6026	Applebaum's Iron & Metal
1969	9-6042	Applebaum's Iron & Metal
1969	9-6184	Jack Owen
1970	0-6017	Allen Transformer Company
1970	0-6111	Interstate Electric Company
1971	1-6023	Jack Lankford
1971	1-6037	Interstate Electric Company
1971	1-6179	Jack Lankford
1972	2-6033	Interstate Electric Company
1972	2-6134	Jack Owen
1973	3-6012	Interstate Electric Company
1973	3-6073	Allen Transformer Company
1974	4-6044	Jack Owen
1974	4-6062	Jack Owen
1974	4-6079	Allen Transformer Company
1974	4-6093	Jack Owen
1974	4-6134	Jack Owen

VENDOR KNOWN

WESTERN DIVISION: (CONTINUED)

YEAR	WORK ORDER NUMBER	VENDOR
1975	5-6006	Jack Owen
1975	5-6052	Jack Owen
1975	5-6126	Applebaum's Iron & Metal
1975	5-6144	Allen Transformer Company
1976	6-6071	Applebaum's Iron & Metal
1976	6-6073	Southwest Electric
1976	6-6107	Interstate Electric Company
1977	7-6109	Jack Owen
1977	7-6132	Greenville Transformer Company
1978	8-6083	Greenville Transformer Company
1978	8-6108	Southern States Specialty
1978	8-6127	Jack Owen
1978	8-6132	Jack Owen
1979	9-6007	Southwest Electric
1979	9-6064	SESCO
1979	9-6076	Southern States Specialty
1980	0-6013	San Angelo Electric
1980	0-6076	SESCO
1981		SESCO
1981	1-6006	Interstate Electric
1981	1-6089	Interstate Electric
1982		Interstate Electric
1982	2-6006	Soloman Electric
1983		Dowzer
1983	3-6006	Frank J. Doyle
1983	3-6083	Interstate Electric
1984		Dowzer
1985	5-6006	Dowzer
1985		Interstate Electric
1986	6-6006	Jimelco
1986		Interstate
1987	7-6006	Dowzer & Jimelco
1987		Jimelco
1988	8-6006	Jimelco & Southwest Electric
1988		Jimelco
1989	9-6006	Southwest Electric
1989		Jimelco
1990	0-6006	Greenville & Frank J. Doyle
1990		Greenville

VENDOR UNKNOWN

WESTERN DIVISION: (CONTINUED)

YEAR	WORK ORDER NUMBER
1935	20230
1936	21103
1937	22317
1937	22397
1937	22398
1937	22444
1939	24159
1940	25135
1941	26121
1942	18094
1943	28402
1943	28433
1946	31153
1947	19034
1947	19060
1947	19072
1947	19122
1948	33014
1949	19545
1949	19647
1949	19688
1950	35495
1951	36411
1952	37342
1953	3-4129
1954	4-6430
1955	5-6577
1956	6-8146
1957	7-6135
1957	7-6138
1958	8-6394
1959	9-6261
1959	9-6279
1959	9-6342
1959	9-6427
1960	0-6290
1960	0-6387
1961	1-6023
1961	1-6090
1961	1-6318
1961	1-6331
1961	1-6398
1962	2-6045
1962	2-6119
1962	2-6121
1962	2-6240
1962	2-6250
1962	2-6280
1962	2-6323
1962	2-6335

VENDOR UNKNOWN

WESTERN DIVISION: (CONTINUED)

YEAR	WORK ORDER NUMBER
1963	3-6035
1963	3-6101
1963	3-6173
1963	3-6238
1963	3-6243
1963	3-6254
1963	3-6300
1963	3-6372
1963	3-6381
1963	3-6459
1963	3-6493
1964	4-6036
1964	4-6050
1964	4-6114
1964	4-6160
1964	4-6168
1965	5-6033
1965	5-6049
1965	5-6088
1965	5-6121
1965	5-6184
1965	5-6204
1965	5-6227
1966	6-6021
1966	6-6053
1966	6-6072
1966	6-6117
1966	6-6123
1966	6-6126
1967	7-6014
1967	7-6064
1967	7-6074
1967	7-6192
1967	7-6201
1968	8-6052
1968	8-6056
1968	8-6094
1968	8-6203
1968	8-6237
1969	9-6081
1970	0-6016
1970	0-6149
1970	0-6163
1971	1-6134
1972	2-6078
1973	3-6013
1973	3-6093
1973	3-6129
1974	4-6121

VENDOR UNKNOWN

WESTERN DIVISION: (CONTINUED)

YEAR	WORK ORDER NUMBER
1975	5-6028
1975	5-6081
1975	5-6163
1976	6-6014
1976	6-6033
1976	6-6068
1976	6-6091
1976	6-6106
1977	7-6117
1978	8-6002
1978	8-6046
1979	9-6006
1979	9-6029
1984	4-6006
1984	4-6027
1985	5-6119

TRANSFORMER SALES

NORTHERN DIVISION:

COMPANY	DATE
City of Fayetteville, AR	03-05-1953
City of Bentonville, AR	03-05-1953
New Orleans Public Service Company	03-27-1944
Texas Power & Light Company	12-17-1943
Southwestern Public Service Company, Amarillo, TX	11-24-1943
City of Siloam Springs, AR	07-26-1949
Fayetteville Iron & Metal Co, Fayetteville, AR	07-15-1953
City of Bentonville, AR	09-09-1953
(10 KVA & Smaller, 2400 Volt-Sent to S'port-Sold to Argentina ? or Brazil?-System Sale)	12-09-1953
Allen Transformer Company-Ft. Smith, AR	05-03-1957
Campbell Soup Company, Fayetteville, AR	05-08-1958
Interstate Electric Co., Ft. Smith, AR	02-22-1961
Interstate Electric Co., Ft. Smith, AR	10-18-1962
Allen Transformer Co., Ft. Smith, AR	07-01-1965
Allen Transformer Co., Ft. Smith, AR	03-31-1971
Allen Transformer Co., Ft. Smith, AR	03-29-1966
Allen Transformer Co., Ft. Smith, AR	01-25-1974
Allen Transformer Co., Ft. Smith, AR	08-26-1974
Rogers Iron & Metal, Rogers, AR	02-04-1975
Allen Transformer Company, Ft. Smith, AR	11-25-1966
Interstate Electric Company, Ft. Smith, AR	12-02-1966
Allen Transformer Company, Ft. Smith, AR	01-12-1967

TRANSFORMER SALESNORTHERN DIVISION: (CONTINUED)

COMPANY	DATE
Bogo Slavsky & Sons, Ft. Smith, AR	12-01-1967
Bogo Slavsky & Sons, Ft. Smith, AR	12-21-1967
Allen Transformer Company, Ft. Smith, AR	06-03-1969
Allen Transformer Company, Ft. Smith, AR	05-12-1969
Allen Transformer Company, Ft. Smith, AR	01-29-1970
Allen Transformer Company, Ft. Smith, AR	04-05-1971
Allen Transformer Company, Ft. Smith, AR	02-23-1971
Yaffee Iron & Metal, Muskogee, OK	08-20-1971
Southwest Scrap Metal, Ft. Smith, AR	08-20-1971
Yaffee Iron & Metal, Muskogee, OK	05-19-1972
City of Siloam Springs, AR	05-04-1972
Southwest Scrap Metal, Ft. Smith, AR	04-10-1973
Southwest Electric Co, Oklahoma City, OK	02-10-1973
Yaffee Iron & Metal Co, Muskogee, OK	08-24-1973
Rogers Iron & Metal Co, Rogers, AR	02-04-1975
Rogers Iron & Metal Co, Rogers, AR	06-02-1975
Interstate Electric Co, Ft. Smith, AR	04-24-1975
Interstate Electric Co, Shreveport, LA	06-20-1975
Southwest Scrap Metal, Ft. Smith, AR	02-02-1976
Sugarloaf Mining Co, Greenwood, AR	12-08-1975
Northwest Electric Co, Fayetteville, AR	08-05-1976
Rogers Iron & Metal, Rogers, AR	11-17-1976
Rogers Iron & Metal, Rogers, AR	11-23-1976
Northwest Electric Co, Fayetteville, AR	04-14-1977
Yaffee Iron & Metal, Muskogee, OK	09-07-1977
Southwest Scrap Metal, Ft. Smith, AR	08-16-1978
Rogers Iron & Metal, Rogers, AR	11-10-1977
Yaffee Iron & Metal, Muskogee, OK	12-07-1978
Southwest Scrap Metals, Ft. Smith, AR	07-14-1978
Yaffee Iron & Metal, Muskogee, OK	07-14-1978
Yaffee Iron & Metal, Muskogee, OK	05-11-1979
Interstate Electric Co, Ft. Smith, AR	11-08-1979
Interstate Electric Co, Ft. Smith, AR	09-30-1980
Interstate Electric Co, Ft. Smith, AR	04-29-1980
Interstate Electric Co, Ft. Smith, AR	11-11-1980
Interstate Electric Co, Ft. Smith, AR	08-21-1981
Interstate Electric Co, Ft. Smith, AR	12-17-1981
Interstate Electric Co, Ft. Smith, AR	11-05-1981
Interstate Electric Co, Ft. Smith, AR	12-17-1981
Interstate Electric Co, Ft. Smith, AR	05-18-1982
Interstate Electric Co, Ft. Smith, AR	10-07-1982
Interstate Electric Co, Ft. Smith, AR	06-18-1984
Interstate Electric Co, Ft. Smith, AR	09-08-1983
Interstate Electric Co, Ft. Smith, AR	06-18-1984
Interstate Electric Co, Ft. Smith, AR	06-18-1984
Interstate Electric Co, Ft. Smith, AR	12-16-1983
Interstate Electric Co, Ft. Smith, AR	06-18-1984

TRANSFORMER SALES

NORTHERN DIVISION: (CONTINUED)

COMPANY	DATE
(Sent to Longview-PCB Filled-For Proper Disposal)	09-23-1985
Interstate Electric Co, Ft. Smith, AR	08-17-1984
Interstate Electric Co, Ft. Smith, AR	02-18-1985
Interstate Electric Co, Ft. Smith, AR	06-12-1985
Interstate Electric Co, Ft. Smith, AR	06-19-1985
Interstate Electric Co, Ft. Smith, AR	09-23-1985
Interstate Electric Co, Ft. Smith, AR	02-17-1986
Jimelco, Jacksonville, AR	12-23-1986
Jimelco, Jacksonville, AR	12-22-1986
Jimelco, Jacksonville, AR	12-23-1986
Jimelco, Jacksonville, AR	12-22-1986
Jimelco, Jacksonville, AR	07-31-1987
B&B Electric, Rogers, AR	10-01-1987
Ohio Transformer, SW Division, Houston, TX	06-23-1987
Doyle Scrap & Metal, Leonard, TX	12-05-1989
Southwest Electric Co, Oklahoma City, OK	12-05-1989
Doyle Scrap & Metal, Leonard, TX	12-05-1989
Doyle Scrap & Metal, Leonard, TX	12-26-1990

TRANSFORMER REPAIRS

NORTHERN DIVISION

COMPANY	DATE
Interstate Electric Co, Ft. Smith, AR	10-31-1942
Interstate Electric Co, Ft. Smith, AR	02-03-1941
Interstate Electric Co, Ft. Smith, AR	09-16-1941
Interstate Electric Co, Ft. Smith, AR	06-14-1940
Interstate Electric Co, Ft. Smith, AR	02-29-1940
Interstate Electric Co, Ft. Smith, AR	08-18-1938
Interstate Electric Co, Ft. Smith, AR	04-14-1939
Interstate Electric Co, Ft. Smith, AR	08-31-1939
Interstate Electric Co, Ft. Smith, AR	08-04-1939
Interstate Electric Co, Ft. Smith, AR	10-31-1943
Interstate Electric Co, Ft. Smith, AR	03-01-1950
Interstate Electric Co, Ft. Smith, AR	03-03-1959
Interstate Electric Co, Ft. Smith, AR	02-22-1961
Allen Transformr Co, Ft. Smith, AR	03-19-1965
Southwest Electric Co, Oklahoma City, OK	02-26-1973
Southwest Electric Co, Oklahoma City, OK	03-19-1975

TRANSFORMERS REPAIRED & JUNKED

CENTRAL DIVISION:

No records prior to 1981

1981-1985	Interstate Electric Company, Repair only
1983-1984	Jim's Electric Company, Repair & bought junk
1984	Dowzer Electric Company, Repair & bought junk
1985-1988	Jimelco, Repair & bought junk
1988-1989	Southwest Electric Company, Repair & bought junk
1990	Greenville Transformer Company, Repair only
1990	F. J. Doyle Company, Bought junk only

SOUTHWESTERN ELECTRIC POWER COMPANY
A Member of the Central and South West System

FOR COMPANY BUSINESS ONLY

SUBJECT: Retired Transformers Sold to Scrap Dealers DATE: April 11, 1991

FROM:	G. W. Hollis	276	Substation	6130 Union Street
		<small>EXT.</small>	<small>DEPT.</small>	<small>LOCATION/ROOM</small>
TO:	Malcolm Smoak		Dist. Operations	Room 424
			<small>DEPT.</small>	<small>LOCATION/ROOM</small>

I have the following records of the sale of scrap transformers to various scrap dealers:

- 1976 - Sold to Allen Transformer Company and Interstate Electric Company in Ft. Smith, Ark.
- 1977 - Sold to Allen Transformer Company.
Sold to T & R Electric Company, P. O. Box 180, Coleman S. Dakota.
Sold to Interstate Electric Company.
Sold to F. J. Doyle Scrap Metal.
Sold to Rogers Iron and Metal, 730 North Arkansas Ave., Rogers, Ark.
- 1978 - Sold to F. J. Doyle Scrap Metal.
Sold to T & R Electric.
- 1979 - Sold to San Angelo Electric Company.
Sold to Soloman Electric Company.
Sold to Southern States Specialty, Inc., San Augustine, Texas.
- 1980 - Sold to Soloman Electric Supply Company.
Sold to San Angelo Electric.
- 1981 - Sold to Southwest Electric Company.
Sold to Interstate Electric Company, Ft. Smith, Arkansas.
Sold to Soloman Electric Company.
- 1982 - Sold to San Angelo Electric Company.
Sold to Southwest Electric Company.
Sold to Yaffee Iron and Metal.
- 1983 - Sold to Jerry's Electric Company, Box 636, Clay City, Kansas.
Sold to Greenville Transformer Company.
Sold to Benton Salvage Company.
Sold to Yaffee Iron and Metal.
Sold to Southwest Power Equipment.
- 1984 - Sold to Pixey Iron and Metal Company.
Sold to Yaffee Iron and Metal Company.
Sold to Dowzer Electric Company - transformers scrapped.
Sold to F. J. Doyle Scrap Metal.
Sold to Southwestern Electric Service Company, Jacksonville, Tex.
Sold to Jerry's Electric Company.
Sold to Greenville Transformer Company.
- 1985 - Sold to F. J. Doyle Scrap Metal.
Sold to Benton Salvage, P.O. Box 4047, Little Rock, Arkansas.
Sold to Jimelco - scrapped transformers.
Sold to Yaffee Iron and Metal Company.
Sold to Dowzer - scrapped transformers.

- 1986 - Sold to Jimelco - scrapped transformers.
Sold to U. S. Transformer, Inc. Jordan, MN 55353.
Sold to F. J. Doyle Scrap Metal.
- 1987 - Sold to Jimelco.
Sold to Ohio Transformer Company.
Sold to T. & R Electric Company.
Sold to Jerry's Electric Company, Inc.
- 1988 - Sold to Southwest Electric Company.
- 1989 - Sold to Greenville Transformer Company.
Sold to F. J. Doyle Scrap Metal.
- 1990 - Sold to F. J. Doyle Scrap Metal.

I can't find records from 1969 thru 1975, but this will cover all the scrap dealers that this Division has ever sold transformers to since 1969. Previous to 1969, I didn't have this job but I remember transformers being sold to Interstate Electric and Allen Transformer Company.

Let me know if more information is needed.

G. W. Hollis
G. W. Hollis

GWH:jg
xc: Chester Remedios
File

RECEIVED

APR 12 1991

OFFICE OF
A. M. SMOAK

RECEIVED

SOUTHWESTERN ELECTRIC POWER COMPANY
P. O. Box 2312
209 South Center Street (75601)
Longview, Texas 75606

APR 10 1991

OFFICE OF
A. M. SMOAKCOVERSHEET

Please hand deliver the following:

FACSIMILE TO: Malcolm SmoakFACSIMILE FROM: Ralph Hall
LongviewTotal number of pages 8, including this cover sheet.

We are transmitting on a Sharp FO-5000 Plain Paper Laser Facsimile Transceiver. If you do not receive all of the pages or if there is a problem, please call: (903) 758-3346, Extension 352 or 353.

Our FAX number is: (903) 758-6927.

COMMENTS: _____

FAX/FORMS

SOUTHWESTERN ELECTRIC POWER COMPANY
A Member of the Central and South West System

FOR COMPANY BUSINESS ONLY

SUBJECT: TRANSFORMERS RETIRED - VENDOR KNOWNDATE: APRIL 9, 1991WESTERN DIVISIONFROM: DAN HILL267OPERATIONSLONGVIEW

EXT.

DEPT.

LOCATION/ROOM

TO: K. G. LAWRENCEOPERATIONSLONGVIEW

DEPT.

LOCATION/ROOM

<u>YEAR</u>	<u>WORK ORDER NUMBER</u>	<u>VENDOR</u>
1960	0-6325	J. R. Winthrop
1961	1-6015	Interstate Electric Company
1961	1-6117	J. R. Winthrop
1961	1-6275	Interstate Electric Company
1961	1-6332	Interstate Electric Company
1962	2-6027	Harold Mayes
1963	3-6129	J. R. Winthrop
1963	3-6290	J. R. Winthrop
1964	4-6133	Interstate Electric Company
1965	5-6178	Interstate Electric Company
1965	5-6207	Allen Transformer Company
1966 <i>insert</i>	6-6016	Allen Transformer Company
1966	6-6023	Jack Owen
1966	6-6047	Allen Transformer Company
1966	6-6172	Jack Owen
1966	6-6256	Allen Transformer Company
1967	7-6159	Jack Owen
1967	7-6161	Jack Owen
1967	7-6181	Allen Transformer Company
1967	7-6242	Allen Transformer Company
1969	9-6007	Allen Transformer Company
1969	9-6026	Applebaum's Iron and Metal
1969	9-6042	Applebaum's Iron and Metal
1969	9-6184	Jack Owen
1970	0-6017	Allen Transformer Company
1970	0-6111	Interstate Electric Company
1971	1-6023	Jack Lankford
1971	1-6037	Interstate Electric Company
1971	1-6179	Jack Lankford
1972	2-6033	Interstate Electric Company
1972	2-6134	Jack Owen
1973	3-6012	Interstate Electric Company
1973	3-6073	Allen Transformer Company
1974	4-6044	Jack Owen
1974	4-6062	Jack Owen
1974	4-6079	Allen Transformer Company
1974	4-6093	Jack Owen
1974	4-6134	Jack Owen

TRANSFORMERS RETIRED - VENDOR KNOWN
 WESTERN DIVISION
 PAGE 2

<u>YEAR</u>	<u>WORK ORDER NUMBER</u>	<u>VENDOR</u>
1975	5-6006	Jack Owen
1975	5-6052	Jack Owen
1975	5-6126	Applebaum's Iron and Metal
1975	5-6144	Allen Transformer Company
1976	6-6071	Applebaum's Iron and Metal
1976	6-6073	Southwest Electric
1976	6-6107	Interstate Electric Company
1977	7-6109	Jack Owen
1977	7-6132	Greenville Transformer Company
1978	8-6083	Greenville Transformer Company
1978	8-6108	Southern States Specialty
1978	8-6127	Jack Owen
1978	8-6132	Jack Owen
1979	9-6007	Southwest Electric
1979	9-6064	SESCO
1979	9-6076	Southern States Specialty
1980	0-6013	San Angelo Electric
1980	0-6076	SESCO
1981 <i>insert</i>	1-6006	Interstate Electric
1981	1-6089	Interstate Electric
1982 <i>insert</i>	2-6006	Soloman Electric
1983	3-6006	Frank J. Doyle
1983	3-6083	Interstate Electric
1985 <i>insert</i>	5-6006	Dowzer
1986	6-6006	Jimelco
1987	7-6006	Dowzer & Jimelco
1988	8-6006	Jimelco & Southwest Electric
1989	9-6006	Southwest Electric
1990	0-6006	Greenville and Frank J. Doyle

D. Hill

Dan Hill

DH/lc

xc: File

SOUTHWESTERN ELECTRIC POWER COMPANY
A Member of the Central and South West System

FOR COMPANY BUSINESS ONLY

SUBJECT: TRANSFORMER REPAIR - VENDOR KNOWNDATE: APRIL 9, 1991WESTERN DIVISIONFROM: DAN HILL267OPERATIONSLONGVIEW

EXT.

DEPT.

LOCATION/ROOM

TO: K. G. LAWRENCEOPERATIONSLONGVIEW

DEPT.

LOCATION/ROOM

YEARWORK ORDER NUMBERVENDOR

1938	7483	Fagin Electric
1939	7574	Fagin Electric
1940	7761	Fagin Electric
1941	7943	Fagin Electric
1941	18012	Fagin Electric
1966 -	6-8086	Interstate
1966	6-8122	Interstate
1981		SESCO
1982		Interstate
1983		Dowzer
1984		Dowzer
1985		Interstate
1986		Interstate
1987		Jimelco
1988		Jimelco
1989		Jimelco
1990		Greenville

Dan Hill

Dan Hill

DH/lc

xc: File

SOUTHWESTERN ELECTRIC POWER COMPANY
A Member of the Central and South West System

FOR COMPANY BUSINESS ONLY

SUBJECT: TRANSFORMER REPAIR - VENDOR UNKNOWNDATE: APRIL 9, 1991WESTERN DIVISIONFROM: DAN HILL267OPERATIONSLONGVIEW

EXT.

DEPT.

LOCATION/ROOM

TO: K. G. LAWRENCEOPERATIONSLONGVIEW

DEPT.

LOCATION/ROOM

YEARWORK ORDER NUMBER

1942	18094
1947	19034
1947	19060
1947	19072
1947	19122
1949	19545
1949	19647
1949	19688
1956	6-8146

Dan Hill

Dan Hill

DH/lc

xc: File

SOUTHWESTERN ELECTRIC POWER COMPANY
A Member of the Central and South West System

FOR COMPANY BUSINESS ONLY

SUBJECT: TRANSFORMERS RETIRED - VENDOR UNKNOWNDATE: APRIL 9, 1991WESTERN DIVISIONFROM: DAN HILL267OPERATIONSLONGVIEWEXT.DEPT.LOCATION/ROOMTO: K. G. LAWRENCEOPERATIONSLONGVIEWDEPT.LOCATION/ROOMYEARWORK ORDER NUMBER

1935	20230
1936	21103
1937	22317
1937	22397
1937	22398
1937	22444
1939	24159
1940	25135
1941 ⁴²	26121
1943	28402
1943	28433
1946 ⁷	31153
1948 ⁷	33014
1950 ⁷	35495
1951	36411
1952	37342
1953	3-4129
1954	4-6430
1955 ⁶	5-6577
1957	7-6135
1957	7-6138
1958	8-6394
1959	9-6261
1959	9-6279
1959	9-6342
1959	9-6427
1960	0-6290
1960	0-6387
1961	1-6023
1961	1-6090
1961	1-6318
1961	1-6331
1961	1-6398
1962	2-6045
1962	2-6119
1962	2-6121
1962	2-6240
1962	2-6250
1962	2-6280
1962	2-6323
1962	2-6335

TRANSFORMERS RETIRED - VENDOR UNKNOWN
WESTERN DIVISION
PAGE 2

<u>YEAR</u>	<u>WORK ORDER NUMBER</u>
1963	3-6035
1963	3-6101
1963	3-6173
1963	3-6238
1963	3-6243
1963	3-6254
1963	3-6300
1963	3-6372
1963	3-6381
1963	3-6459
1963	3-6493
1964	4-6036
1964	4-6050
1964	4-6114
1964	4-6160
1964	4-6168
1965	5-6033
1965	5-6049
1965	5-6088
1965	5-6121
1965	5-6184
1965	5-6204
1965	5-6227
1966	6-6021
1966	6-6053
1966	6-6072
1966	6-6117
1966	6-6123
1966	6-6126
1967	7-6014
1967	7-6064
1967	7-6074
1967	7-6192
1967	7-6201
1968	8-6052
1968	8-6056
1968	8-6094
1968	8-6203
1968	8-6237
1969	9-6081
1970	0-6016
1970	0-6149
1970	0-6163
1971	1-6134
1972	2-6078
1973	3-6013
1973	3-6093
1973	3-6129
1974	4-6121

TRANSFORMERS RETIRED - VENDOR UNKNOWN
WESTERN DIVISION
PAGE 3

<u>YEAR</u>	<u>WORK ORDER NUMBER</u>
1975	5-6028
1975	5-6081
1975	5-6163
1976	6-6014
1976	6-6033
1976	6-6068
1976	6-6091
1976	6-6106
1977	7-6117
1978	8-6002
1978	8-6046
1979	9-6006
1979	9-6029
1984	4-6006
1984	4-6027
1985	5-6119

Dan Hill

Dan Hill

DH/lc

xc: File

My dear Mr. [unclear]
I have just received your letter of the 14th inst. and am
glad to hear that you are well and hope to hear from you
again soon.

TRANSFORMER SALES

PAGE 1 OF

1	2	3	4	5	6	7
	COMPANY					DATE
1	CITY OF FAYETTEVILLE, AR					3-5-1953
2	CITY OF BENTONVILLE, AR					3-5-1953
3	NEW ORLEANS PUBLIC SCHOOL CO.					3-27-1949
4	TEXAS POWER & LIGHT CO.					12-17-1945
5	SOUTHWESTERN PUBLIC SERVICE CO. DARRIGO, TX.					11-24-1948
6	CITY OF SLOAN SPRINGS, AR.					7-26-1949
7	FAYETTEVILLE IRON & METAL CO., FAYETTEVILLE, AR					7-15-1953
8	CITY OF BENTONVILLE, AR.					2-9-1953
9	COOK & SON, CHICAGO - SOLD TO SPORT-					12-9-1953
10	SOLD TO GREENE COUNTY, MISSISSIPPI - (SYSTEM SALE)					
11	ALLEN TRANSFORMER COMPANY - FT. SMITH, AR					5-3-1957
12	CAMPBELL SOUP CO., FAYETTEVILLE, AR					5-8-1958
13	INTERSTATE ELECTRIC CO., FT. SMITH, AR					2-22-1961
14	INTERSTATE ELECTRIC CO., FT. SMITH, AR					10-18-1962
15	ALLEN TRANSFORMER CO., FT. SMITH, AR					7-1-1965
16	ALLEN TRANSFORMER CO., FT. SMITH, AR					3-31-1971
17	ALLEN TRANSFORMER CO., FT. SMITH, AR					3-29-1966
18	ALLEN TRANSFORMER CO., FT. SMITH, AR					1-25-1971
19	ALLEN TRANSFORMER CO., FT. SMITH, AR					8-26-1974
20	ROGERS IRON & METAL, ROGERS, AR					2-4-1972
21	ALLEN TRANSFORMER CO., FT. SMITH, AR					11-25-1966
22	INTERSTATE ELECTRIC CO., FT. SMITH, AR					12-2-1966
23	ALLEN TRANSFORMER CO., FT. SMITH, AR					1-12-1967
24	BOGOSLANSKY & SONS, FT. SMITH, AR					12-1-1967
25	BOGOSLANSKY & SONS, FT. SMITH, AR					12-21-1967
26	ALLEN TRANSFORMER CO., FT. SMITH, AR					2-3-1969
27	ALLEN TRANSFORMER CO., FT. SMITH, AR					5-12-1969
28	ALLEN TRANSFORMER CO., FT. SMITH, AR					1-29-1970
29	ALLEN TRANSFORMER CO., FT. SMITH, AR					4-5-1971
30	ALLEN TRANSFORMER CO., FT. SMITH, AR					2-23-1971
31	HAFF IRON & METAL, MUSKOGEE, OK					8-20-1971
32	SOUTHWEST SCRAP METAL, FT. SMITH, AR.					8-20-1971
33	TRAFF IRON & METAL, MUSKOGEE, OK					5-19-1971
34	CITY OF SLOAN SPRINGS, AR					5-4-1972
35	SOUTHWEST SCRAP METAL, FT. SMITH, AR.					4-10-1972
36	SOUTHWEST ELECTRIC CO., OKLA CITY, OK					2-10-1972
37	HAFF IRON & METAL CO., MUSKOGEE, OK					8-24-1972
38	ROGERS IRON & METAL CO., ROGERS, AR					2-4-1972
39	ROGERS IRON & METAL CO., ROGERS, AR					6-2-1975
40	INTERSTATE ELECTRIC CO., FT. SMITH, AR					4-24-1975
41	INTERSTATE ELECTRIC CO., SCHREVEPORT, LA.					6-26-1975
42	SOUTHWEST SCRAP METAL, FT. SMITH, AR					2-2-1976
43	SUGARLOVE MINING CO., GREENWOOD, AR.					12-8-1975
44	NORTHWEST ELECTRIC CO., FAYETTEVILLE, AR					8-5-1976
45	ROGERS IRON & METAL, ROGERS, AR					11-17-1976
46	ROGERS IRON & METAL, ROGERS, AR.					11-23-1976
47						000166

TRANSFORMER SALES

PAGE 2 OF 2

[illegible]

TRANSFORMER REPAIRS

PAGE 1 OF 1

1	2	3	4	5	6	7
COMPANY						DATE
1	INTERSTATE ELECTRIC CO, FT. SMITH, AR.					10-31-1942
2	INTERSTATE ELECTRIC CO, FT. SMITH, AR.					2-3-1941
3	INTERSTATE ELECTRIC CO, FT. SMITH, AR.					9-16-1941
4	INTERSTATE ELECTRIC CO, FT. SMITH, AR.					6-14-1946
5	INTERSTATE ELECTRIC CO, FT. SMITH, AR.					2-29-1940
6	INTERSTATE ELECTRIC CO, FT. SMITH, AR.					8-18-1938
7	INTERSTATE ELECTRIC CO, FT. SMITH, AR.					4-14-1939
8	INTERSTATE ELECTRIC CO, FT. SMITH, AR.					8-31-1939
9	INTERSTATE ELECTRIC CO, FT. SMITH, AR.					8-4-1939
10	INTERSTATE ELECTRIC CO, FT. SMITH, AR.					10-31-1943
11	INTERSTATE ELECTRIC CO, FT. SMITH, AR.					3-1-1950
12	INTERSTATE ELECTRIC CO, FT. SMITH, AR.					3-3-1959
13	INTERSTATE ELECTRIC CO, FT. SMITH, AR.					2-22-1961
14	ALLEN TRANSFORMER CO, FT. SMITH, AR.					3-19-1965
15	SOUTHWEST ELECTRIC CO, OKLA CITY, OK.					2-26-1975
16	SOUTHWEST ELECTRIC CO, OKLA CITY, OK.					3-19-1975
17						
18						
19						
20						
21						
22						
23	NOTE: AN ANNUAL TRANSFORMER REPAIR BID					
24	WAS PREPARED BY G.O. OPERATIONS. NO RECORDS					
25	KEPT AS TO BEPAIR COMPANY PAST 1975.					
26						
27						
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47						

RECEIVED

APR 08 1991

OFFICE OF
A. M. SMOYER

✓ C.O.

TRANSFORMERS REPAIRED & JUNKED

1981-1985 INTERSTATE ELECTRIC CO. REPAIR ONLY

1983-1984 JIM'S ELECTRIC CO REPAIR AND BOUGHT JUNK

1984 DOWZER ELECTRIC CO. REPAIR AND BOUGHT JUNK

1985-1988 JIMELCO REPAIR AND BOUGHT JUNK

1988-1989 SOUTHWEST ELECTRIC CO REPAIR AND BOUGHT JUNK

1990 GREENVILLE TRANSFORMER CO REPAIR ONLY

1990 - F.J. DOYLE CO BOUGHT JUNK ONLY

No Records prior to 1981

Jim's Electric Co. (Later became Jimelco)

P.O. Box 216

Jacksonville Ark. 72076

Interstate Electric

South 5th & E. Street

Fort Smith Ark. 72902

Box 969



Central and South West Services, Inc.

APR 11 1989

FOR COMPANY BUSINESS ONLY

SUBJECT: F.J. Doyle Metals

April 10, 1989

TO: Jay Pruett

FROM: Curtis Carter

I audited F.J. Doyle Metals on April 7, 1989. The attached file contains the information gained during the site visit.

If you have any questions or need additional information, please call me. Thanks for the opportunity to help.

CKC/bj

Attachment

cc: Chris Bissett
Monty Jasper
Lou Hosek

Jane D. -
apparently, we
have used these people
in the past. Do we
have an outside vendor
audit site? if not we
probably need one
Lou

I. General Information

1. Facility name, mailing address, and telephone number:

F.J. Doyle Scrap Metals
BOX 312
Leonard Tx 75452 (214) 587-3342

2. Location/address (if different):

next to 305 Cottonwood
Leonard, Tx

3. Principal contact(s), title(s), and telephone number(s):

F.J. Doyle

4. Type of facility (check all applicable):

- | | |
|--|---|
| a. <input type="checkbox"/> Co-disposal landfill | g. <input type="checkbox"/> Detoxification/chemical treatment |
| b. <input type="checkbox"/> Secure landfill | h. <input type="checkbox"/> Solvent recovery/recycle |
| c. <input type="checkbox"/> Aqueous treatment | i. <input type="checkbox"/> Broker/transshipment/bulk storage |
| d. <input type="checkbox"/> Incineration | j. <input type="checkbox"/> Oil recovery/recycle |
| e. <input type="checkbox"/> Biological treatment | k. <input type="checkbox"/> PCBs >50 ppm accepted at the facility |
| f. <input type="checkbox"/> Solar evaporation | l. <input checked="" type="checkbox"/> Other (describe) <u>metal recycler</u> |

5. List the owners of the facility and their mailing addresses.

F.J. & Mona Doyle
305 Cottonwood
Leonard, Texas 75452

6. If the facility is a subsidiary, what is the name, address, principal contact(s), and telephone number(s) of the parent corporation/organization?

NA

7. List the facility's (and parent's) four digit Standard Industrial Classification (SIC) Code(s), with description(s):

8. Do you have any areas where you restrict access to site inspectors? If so, what are they and why?

NA

Comments:

II. Financial

1. Which form of management does the firm operate under:

<input type="checkbox"/> Municipality	<input type="checkbox"/> Limited Partnership
<input checked="" type="checkbox"/> Proprietorship	<input type="checkbox"/> Other Partnership
<input type="checkbox"/> Corporation	<input type="checkbox"/> Other

2. What is the firm's Dun & Bradstreet number? *NA*

Parent _____ Facility _____
Please attach the D&B report(s).

3. If management is partnership, list the names and addresses of all partners both general and limited.

NA

4. Attach annual report with certified financial statements. *NA*

5. Attach SEC Form 10K (only applicable in a publicly owned corporation). *NA*

6. Attach a copy of the following: (if available) *NA*

- The documentation submitted to the EPA Regional Administrator (RA) or the State as evidence of satisfying the EPA financial assurance mechanism for liability, insurance and closure (and post-closure, if applicable) of facilities who are regulated under RCRA;
- A letter sent to the RA or the State signed by the chief financial officer that includes required data from the independently audited, year-end financial statement;
- An independent CPA's report on examination of the financial statements for the last completed fiscal year; and
- A special report from the owner's or operator's independent CPA to the owner or operator stating that: 1) the accountant has compared the data with the letter from the chief financial officer specified as having been derived from the independently audited, year-end financial statements for the latest fiscal year with the amounts in such financial statements, and 2) no matters came to his attention which caused him to believe that the specified data should be adjusted.

7. Attach a copy of the company's standard waste disposal contract. *NA*

8. What is the firm's policy on indemnification by the parent corporation for acts of individual sites/subsidiaries?

NA

9. What is the firm's current bond rating (only applicable in publicly-owned corporation)?

NA

Standard & Poors: _____ Moody's: _____

10. Does the site have general liability or environmental impairment insurance? YES ☒ NO ☐ *general liability only*

For both policies:

a. Who is the carrier? _____

b. How long has the policy been in place? _____

c. Has any claim been made against the policy? YES ☐ NO ☐

d. By whom, when, and nature of claims?

e. What are the policy limits? (e.g., \$3 million per occurrence and \$6 million annual aggregate)

f. What were the policy limits for the three previous years?

12. Have any insurance policies been terminated, cancelled or refused renewal by any of the insurance carriers? YES _____ NO _____

Please explain:

13. Provide copies of certificates of insurance.

14. Did any insurance carrier have an independent engineering/risk assessment audit performed before issuing any of the insurance policies listed above? YES _____ NO _____

If yes, please provide us with a copy of this report?

III. Administrative

1. Please describe the facility's management chain-of-command or attach an organization chart.

F. J. Doyle

2. Please describe the background/experience/training of the facility's management. Include at a minimum the facility's general manager, sales director, technical director and laboratory director. If available, attaching resumes is sufficient.

NA

3. How many employees are there and what is the breakdown by department?

3 - Doyle, his son and son-in-law

4. For the past three (3) years, please provide the total number of full-time and part-time (each) employees at the start of each year by major departments (e.g., sales, lab, technical, and office). Any consistent accounting year is satisfactory.

3 total

5. What is the annual employee turnover rate for the past three years?

0

6. Please provide the names and telephone numbers of the person(s) responsible for each of the following:

a. General Manager:

F.J. Doyle

b. Technical Operations:

c. Sales/Marketing:

d. Laboratory/Quality Control:

e. Permits/Regulatory Compliance:

(1) Environmental:

(2) DOT:

(3) OSHA:

f. Security:

g. Emergency Response:

h. Personnel Training:

Comments:

Same as above

IV. Regulatory

1. What is your EPA RCRA I.D. No.? *does not have state or federal #'s*
2. Please list all applicable permits from federal, state, or municipal authorities governing discharges into water or air, and treatment, storage, and disposal, or transport of wastes. Attach copies.

Please send a copy of the RCRA Part A permit application and a copy of the General Facility Description section from the Part B application.

3. Provide names and telephone numbers of the environmental regulatory officials, from each of the permit agencies above, with whom the facility's management deal. Include both an enforcement/inspection and a permit writer/reviewer from each agency.

Texas Air Control Board

Ft. Worth

(817) 732-5531

construction permit #5-18612

4. Has the facility or any of its employees been charged with non-compliance of any permit or had any fine or penalty imposed within the last three (3) years? *no*

Attach copies, or state whether copies will be made available, of any notices relating to any past or present violations, fines, or pending or alleged non-compliance activities.

5. Have there been any allegations of violations made against the facility or its employees? If so, attach copies of allegations or explain below.

previous burning of material to remove insulation

5. Provide a summary of all past (last ten (10) years), current or pending environmental litigation involving the facility, its employees or its parent organization. In preparing this summary, please answer the following:

- a. Are there any previous, current or pending lawsuits against the firm alleging its responsibility for environmental damage to persons, property, or natural resources? YES _____ NO ☒

If so, what are the known details of this litigation?

6. Are there any past, current or pending regulatory actions by federal, state, or local environmental officials that allege the firm's non-compliance with existing environmental regulations, or would require the firm to monitor and/or clean up an existing or ongoing contamination problem? YES _____ NO ☒

If so, what are the known details?

7. Are there any existing on-site or off-site contamination problems (of air, soils, surface or ground water) related to the corporation's activities of which the firm is currently aware, or is in the process of investigating? Yes _____ NO ☒

If so, what are the known details?

8. Have any officers or directors of the facility or its parent corporation been convicted of any state or federal securities violations? YES _____ NO ✓

If so, explain.

Comments:

V. Community Relations

1. What is the name of the newspaper(s) that generally covers the facility? *The Leonard Graphic (weekly)*
Greenville Herald Banner (daily)
2. Please provide five (5) references (name, affiliation, telephone) familiar with the operation of your facility, at least three (3) of which are waste generators who use the facility.

- a. *Louisiana Power & Light*
- b. *City of Garland*
- c. *Public Service of Oklahoma*
- d.
- e.

3. Please identify at least two (2) of the local emergency response teams (e.g., fire, police, hospital), with the name and telephone of a contact at that organization.

- a. *Leonard Volunteer Fire Dept.*
- b. *Leonard Police Dept*

other

4. Please identify at least three (3) local officials (elected or appointed), preferably one with general authority (e.g., mayor, selectman, town council members, etc.) and one or more with specific regulatory responsibilities (e.g., zoning board or wetlands commission member, health officer, etc.). Include telephone numbers.

- a. *Darvin Nolen - Public Works Director (214) 587-3334*
- b. *Lanna Jackson - City Administrator (214) 587-3334*

Comments:

Billy Harold Martin - Mayor

VI. Facility Description

1. General

a. Location: (Show site boundaries on a USGS map)

b. Size:

- (1) Total acreage 100' x 180'
- (2) Acreage dedicated to waste treatment/disposal all
- (3) Acreage vacant but available for waste treatment/disposal

c. Method of waste delivery by Doyle's - 18 wheeler

d. Describe former activities on-site (if any) none - vacant lots

e. What wastes are received for treatment/disposal? (Complete attached Table I) drained transformers to be scrapped (< 50 ppm PCB only)

f. What wastes are specifically not handled by this facility, although they may not be excluded under the permit to operate? Doyle does not except transformer with ≥ 50 ppm PCB

g. What are hours of operation? function of work load

h. How is site access controlled (e.g., describe receiving procedures security fences/barriers, identification of persons entering, etc.) wood fence with locked gates

i. What is the projected site life? ∞

2. Waste Storage

a. Above-ground Tanks

- (1) Complete Table II regarding number, size, contents, material, design, etc. of tanks. SPCC plan not required; tank storage
Attach copy of SPCC plan. 4 1600 gallons.
- (2) Describe distribution system from receiving point(s) to tanks.

above ground hose and pump (less than 20' run)

TABLE I

General Types of Materials Received

WASTE TYPE	DRUMS OR CONTAINERS	PHYSICAL STATE			MAJOR CUSTOMER (if any)
		LIQUID	SLUDGES	SOLIDS	
Domestic Solid Waste					
Flammable/Combustible					
Heavy Metals					
Biocides					
Acids					
Bases					
Biological					
Oxidizers					
Water Reactives					
Air Reactives					
Persistent Organics					
Infectious					
Asbestos					
Heavy Oil					
PCB's					
Other					

PLACE "X" IN APPROPRIATE BOXES

TABLE II

Above-Ground Tank Storage Information

[illegible]

Is piping underground? If so, what percentage of piping is underground? no

If yes, how often and how is it tested? _____

Fail safe interlocks? no

- (3) Describe distribution system from tanks to ultimate disposal or treatment. pumped from tanks by Scoggins Oil Sallisaw, Oklahoma

Is piping underground? If so, what percentage of piping is underground? no

If yes, how often and how is it tested? _____

Fail safe interlocks? unknown

Waste Feed Shut-off? unknown

- (4) Are tanks vented through scrubbers or vapor recovery systems? no

- (5) What is the ultimate destination of the rain water runoff in the outdoor tank area? Arnold Creek or unnamed tributary of the So. Sulphur R. depending on routing of drainage caused by Railroad and main highway

b. Underground Tanks NA

- (1) Complete Table III regarding number, size, material, age, design, etc. of tanks.

- (2) Identify secondary containment where appropriate _____

- (3) How often, and how are tanks integrity tested? _____

- (4) Describe distribution system from receiving point(s) to tanks.

Is piping underground? If so, what percentage of piping is underground? _____

If yes, how often and how is it integrity tested? _____

Fail safe interlocks? _____

- (5) Describe distribution system from tanks to ultimate disposal or treatment. _____

Is piping underground? _____

If yes, how often and how is it tested? _____

Fail safe interlocks? _____

- (6) Are tanks vented through scrubbers or vapor recovery systems? _____

c. Container/Drum Storage (include portable tanks)

- (1) Maximum area dedicated to container/drum storage. _____
50' x 100'

- (2) Design of container/drum storage area:

(a) Covered? NO

(b) Impermeable base? NO

(c) Diked? NO

(d) Segregated areas for incompatible materials? _____
NA

- (3) Estimated current number of containers/drums in storage on-site 40 drums of scrap; 10 drums of ash/insulators and
50 transformer cans (empty)

- (4) Are there warehousing or staging areas off-site? If so, what is the address? NO

- (b) What percentage of overall container/drum storage is at this site? 100%

- (c) Site permit or EPA I.D. Number for storage. NA

- (d) Are any of the containers/drums stored for more than ninety days? If so, what percentage of the containers/drums are stored for longer than ninety days? NA

d. Lagoons or Impoundments NA

- (1) Complete Table IV regarding number, size, contents, design, etc. of lagoons/impoundments.

TABLE III

Underground Tank Storage Information

[illegible]

(2) How is ground water monitored in vicinity of the lagoon/impoundment?

e. Waste Storage Piles (for each) *NA*

(1) Number _____

(2) Contents _____

(3) Volume _____

(4) Base material type _____ Thickness _____

Permeability _____

(5) Runoff control system _____

f. Landfills (for each) *NA*

(1) Area of active landfill _____

Available capacity _____

(2) Area of proposed landfill _____

(3) Area of closed landfills _____

(4) Waste types and quantity: _____

Active _____

Past _____

(5) Are materials fixed or stabilized before landfilling? _____

Describe materials and process _____

(6) Liner specifications (each)

(7) Leachate detection and collection systems (each)

(8) How do you dispose of leachate _____

(9) Thickness and type of cover material (intermediate and final)

TABLE IV

Lagoon/Impoundment Information

[illegible]

(10) Is there ground water monitoring around the perimeter of the landfill? _____

(11) Are on-site disposal contracts carried out under long-term contract or on a lot-by-lot basis? Describe arrangements:

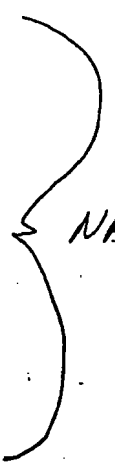
g. Surface water control

For each storage area and type, describe run-off/run-on control and methods of testing and treating collected liquids.

None

3. Waste Treatment *NA*

a. Does the site have the following processing capabilities?

	<u>Type</u>	<u>Capacity</u>	
Oil Recycling	_____	_____	 <i>NA</i>
Solvent Reclamation	_____	_____	
Oil/Water Separation	_____	_____	
Acid/Base Neutralization	_____	_____	
Cyanide Destruction	_____	_____	
Sludge Dewatering	_____	_____	
Sludge Stabilization	_____	_____	

b. For each process, what is done with the following?

Recoverable products _____

Liquid residuals _____

Sludge or solid residuals _____

c. What is the average length of time between the receiving of the waste and the processing? _____

d. What is the site's main waste treatment process? _____

4. Waste Destruction

a. Incineration

(1) Type _____

(2) Capacity _____

(3) Materials Handled _____

(4) Destruction Efficiency _____

(5) Scrubber Efficiency _____

(6) Emission Rates _____

(7) Waste Feed Limits (set by RCRA permit) _____

(8) Has dispersion modeling been conducted for the point source? _____

(9) Fate of scrubber sludge or solid residuals _____

(10) Fate of incineration solid residuals _____

b. Other destruction capacity

Describe process capacity and fate of residuals. burn-out oven;
ash to son's father-in-law's property for
disposal

5. Waste Bulking and Transshipment (repackaging for shipment) NA

a. Are wastes collected at the site for treatment elsewhere? _____

b. Describe type of wastes and any bulking process. _____

- c. Is off-site treatment carried out on a long-term contract or lot-by-lot basis? _____

Describe arrangements. _____

- d. Identify off-site treatment facilities by waste type. _____

6. Electric Equipment Rebuilding and Salvaging

- a. What is the disposal procedure for the waste oil? Include data about the disposal site. Scoggins Oil Sallisaw, Ok.

- b. What is the disposal procedure for the scrap metal?

Sold to various junk companies - mostly to
McKinney Junk Co. McKinney Tx. ; ash from
burn-out oven to private property land disposal

- c. How is the oil stored while on site? in two above ground
tanks

- d. What are the special handling procedures (if any) for the oil?

None

7. PCB processing (optional-to be filled out by PCB disposers only) NA

- a. What means of processing is used at this site for the materials (oils, waste metals, etc.) contaminated with PCB's (polychlorinated biphenyl's)?

Type	Yearly amount (in lbs, gallons, etc) PCB contaminated material processed
Land filling	
Oil recycling	
Incineration	
Other means of destruction	

- b. List any previous processing practices that are different than those above.
- c. How long has this site processed PCB's?
- d. Attach the site's federal, state, or local permits which regulate the PCB processing at the site.
- e. How is the PCB contaminated material transported to the site?
- f. Attach the transporter's federal, state, or local permit for transporting PCB's (if available).
- g. What is the average length of time between the receiving the PCB contaminated materials and their processing?
- h. Are there any by-products (e.g., air emissions, residues, etc.) generated by the processing of PCB contaminated materials? If so, indicate the engineering controls used to limit any exposure that may occur.

VII. Employee Training (Job) *NA*

1. Initial Training:

a. Upon first employment, what training is provided to the new employee? _____

b. Who is the instructor? _____

What is the instructor's qualifications? _____

c. How is previous employee training verified? _____

d. What on-the-job training is provided? _____

Who is responsible for the on-the-job training? _____

e. How is the comprehension of the training by the employee measured?
(e.g., classroom testing, supervisor's reports, etc.) _____

2. Employee Retraining and Updating:

a. What additional training is provided to employees after the initial training? (e.g., regulation updates, new safety equipment) _____

b. Who is the instructor? _____

What are the instructor's qualifications? _____

c. How is the comprehension of the training by the employee measured?
(e.g., classroom testing, supervisor's reports, etc.) _____

3. Employee Training at a RCRA Regulated Site NA

- a. What specialized training is provided to the employees who will be handling hazardous wastes?
- b. Who provides the training?
- c. What are the instructor's qualifications?
- d. How is the employee comprehension of the training measured?
- e. What training are the employees given in the wearing of a respirator?
- f. What manner of respirator fit testing is provided for the employees handling the hazardous wastes?

VIII. Site Characterization:

1. Land Use:

- a. Property use and zoning (provide direction from facility)
residential on 3 sides with High School on one side
- b. Are crops grown on adjacent properties? private gardens
Type? _____
- c. Population within 1 mile? _____
Direction to concentrations? SSW
Population within 3 miles? the entire population of Leonard (~1500)
Direction to concentrations? SSW
- d. Location of sensitive receptors (schools, hospitals, etc.)
Type? school Direction? E
Distance? 200 ft.
- e. Prevailing wind direction and speed. NA

2. Surface Water:

a. Nearest River or Stream

- (1) Name Arnold Creek or unnamed tributary of So. Sulphur R.
(2) Distance ≈ 1 mi.
(3) 7 day 10-yr. low flow unknown
(4) Water quality classification unclassified
(5) Uses unknown

b. Drinking Water Source

- (1) Name _____
(2) Distance _____
(3) Population served _____
(4) Other downstream data _____

c. Nearest Reservoir/Lake

- (1) Name Lavon (Arnold Cr. drainage)
(2) Distance 17 mi.
(3) Volume 956,500 ac-ft
(4) Water quality classification public water supply
(5) Use _____

- (1) Lake Texarkana (So. Sulphur R. drainage)
(2) 112 mi.
(3) 145,300 ac-ft
(4) public water supply

d. Flooding

- (1) Is any part of the facility located within the 100-year flood plain or a coastal high hazard zone? NO
- (2) If yes, describe flood protection for active and inactive areas NA
- (3) Has the site sustained any past flood damage? NO
Describe _____

e. Monitoring

- (1) Is surface water monitored at the facility? NO
- (2) If yes, describe location and parameters used.

3. Ground Water:

- a. Depth to water table? _____
- b. Depth to usable aquifer? _____ Name _____
- c. Distance to nearest down gradient high capacity well? 2 blocks
What is the well used for? municipal water supply (1700' deep)
- d. Distance to nearest low capacity well (domestic)? < 2 blocks
- e. Is site in an aquifer recharge zone? NO
- f. Surficial material at site? Gober Chalk
Type? _____ Thickness? ~ 400'
- g. Impermeable layers - formation name _____
Depth _____ Material; _____
Thickness _____ (for each)
- h. Aquifers - Formation Name _____
Depth _____ Material; _____
Thickness _____ Usage _____ (for each)

i. Within 3 miles of the site has there been:

(1) extensive ground water use for a long period of time? _____

yes

(2) oil or mineral borings? _____

unknown

j. Has ground water modeling been carried out for the site? _____

No

If yes, Title of Report and Author _____

k. Describe the general geohydrologic setting _____

l. Ground Water monitoring

Number of Wells _____

none

Frequency of Monitoring _____

Parameters Monitored _____

IX. Source Information

1. Air

- a. Identify potential sources of airborne emissions associated with the site burn-out oven

(1) Point sources:

Incinerators _____
Scrubbers _____
Vents _____
Tank Vents _____

(2) Fugitive:

Storage piles _____
Lagoons _____
Building Vents _____

- b. Identify and quantify control technology for each source. none

- c. Does the site have federal, state or local air emission permits or licenses? yes If yes, please list all permits and licenses by source and include permit numbers and permissible emission guidelines.

<u>Source</u>	<u>Permit or License No.</u>	<u>Permissible Emissions</u>
<u>burn-out oven</u>	<u>construction permit</u> <u>#5-18612</u> <u>issued 8-10-88</u>	

- d. Does the site meet its permit emissions standards? _____ If no, please identify the emission standard(s) not being met and indicate engineering controls (if any) being undertaken to control the contaminant(s).

Doyle has not request operating permit; however the burn-out oven is in use.

- e. Identify control technology for each source. all material burned
MUST have documentation that it was < 50 ppm PCB; feed to
oven must be < 10% combustible material; temperature controls;
ash handled in such a manner as not to become air borne.
- f. Has air dispersion modeling been done for routine and emergency conditions? NO
- _____
- _____
- _____

If yes, please provide report.

2. Water

- a. Identify sources of waste water originating at the site. Storm water
runoff only

- b. Identify approximate volume from each source and major chemical constituents or properties.

NA

- c. Identify the fate of each stream.

See VIII (2)(a)

- (1) Small volumes collected on drums or tanks for off-site treatment. Identify ultimate disposal.

- (2) If wastewater is conveyed by sewer to on-site or off-site treatment/disposal, Identify: NA

(a) Ownership of sewer (municipal or client)

(b) Age and construction material of sewer system

(c) Has integrity of sewer system been checked within last 3 years? If yes, when, how, and results.

NA

(d) Does the site meet its effluent guidelines? ____ If no, please identify the effluent guideline not being met and indicate engineering controls (if any) being undertaken to control the contaminant(s).

NA

(e) Does the site have federal, state or local waste water discharge permits or licenses? NO If yes, please list all permits and licenses for each outfall and include permit numbers and effluent guidelines.

<u>Outfall</u>	<u>Permit or License No.</u>	<u>Effluent Guidelines</u>
----------------	----------------------------------	--------------------------------

3. Laboratory NO lab

a. Are there on-site analytical capabilities? If yes, complete the next sections for that lab. If no, complete the next sections for the lab that does the analyses.

b. List of major analytical equipment (e.g., G/C, A/A, etc.)

c. Types of analyses performed by the lab (e.g., GC, AA, etc.)

d. Qualifications of the lab director and chemists _____

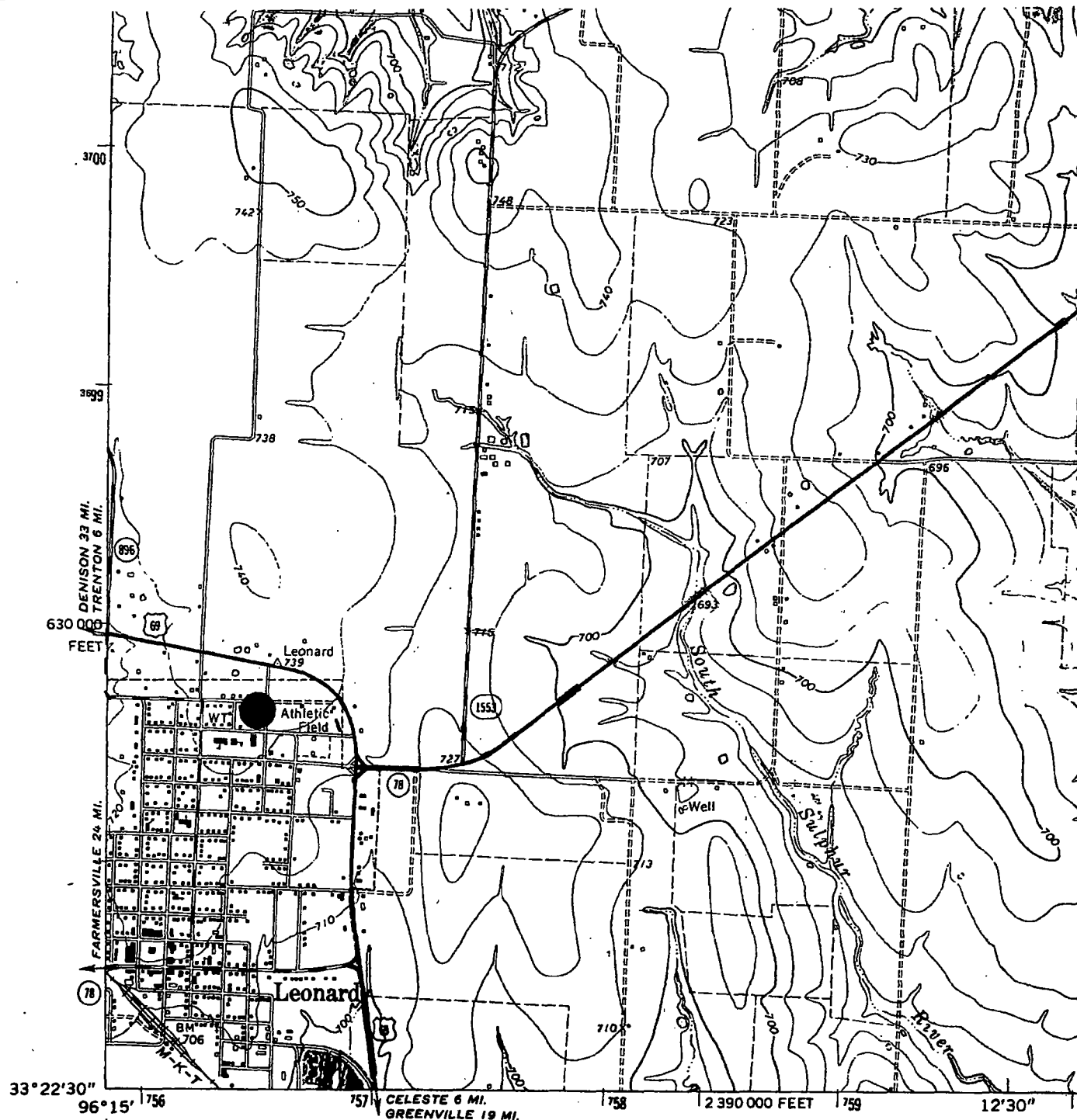
e. Describe chain of custody procedure and attach a copy of the form.

f. What laboratory does the analytical certification? _____

Fannin County Appraisal District: Wylma Dunn (4-7-89)
(214) 583-9546

Owner	Property ID	Current through	Appraised value
Frank J. Doyle	0783-019-0000-02	1988	\$44,430
" "	9030-014-00034-02 *	1988	57,860
" "	9030-014-0005A-02	1988	3,560
" "	9030-014-0007A-02	1988	6,440
" "	9030-013-0005A-02	1988	21,010

* homestead



(PIKE)
6780 IV SE

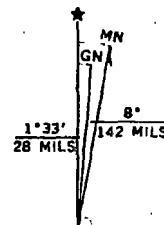
Mapped, edited, and published by the Geological Survey

Control by USGS and USC&GS

Topography by photogrammetric methods from aerial photographs taken 1964. Field checked 1964

Polyconic projection. 1927 North American datum
10,000-foot grid based on Texas coordinate system,
north central zone
1000-meter Universal Transverse Mercator grid ticks,
zone 14, shown in blue

Fine red dashed lines indicate selected fence lines



UTM GRID AND 1964 MAGNETIC NORTH
DECLINATION AT CENTER OF SHEET

FOR

Leonard, Tx Quad

000206



Central and South West Services, Inc.

file copy

FOR COMPANY BUSINESS ONLY

SUBJECT: F.J. Doyle Metals.

April 10, 1989

TO: Jay Pruett

FROM: Curtis Carter

I audited F.J. Doyle Metals on April 7, 1989. The attached file contains the information gained during the site visit.

If you have any questions or need additional information, please call me.
Thanks for the opportunity to help.

CKC/bj

Attachment

cc: Chris Bissett
Monty Jasper
Lou Hosek

CITY OF LEONARD

P.O. Box I
Leonard, Texas 75452

Darvin Nolen
Public Works Director

(214) 587-3334

I. General Information

1. Facility name, mailing address, and telephone number:

F. J. Doyle Scrap Metals
Box 312
Leonard Tx 75452 (214) 587-3342

2. Location/address (if different):

next to 305 Cottonwood
Leonard, Tx

3. Principal contact(s), title(s), and telephone number(s):

F. J. Doyle

4. Type of facility (check all applicable):

- | | |
|--|---|
| a. <input type="checkbox"/> Co-disposal landfill | g. <input type="checkbox"/> Detoxification/chemical treatment |
| b. <input type="checkbox"/> Secure landfill | h. <input type="checkbox"/> Solvent recovery/recycle |
| c. <input type="checkbox"/> Aqueous treatment | i. <input type="checkbox"/> Broker/transshipment/bulk storage |
| d. <input type="checkbox"/> Incineration | j. <input type="checkbox"/> Oil recovery/recycle |
| e. <input type="checkbox"/> Biological treatment | k. <input type="checkbox"/> PCBs >50 ppm accepted at the facility |
| f. <input type="checkbox"/> Solar evaporation | l. <input checked="" type="checkbox"/> Other (describe) <u>metal recycler</u> |

5. List the owners of the facility and their mailing addresses.

F. J. & Mona Doyle
305 Cottonwood
Leonard, Texas 75452

6. If the facility is a subsidiary, what is the name, address, principal contact(s), and telephone number(s) of the parent corporation/organization?

NA

7. List the facility's (and parent's) four digit Standard Industrial Classification (SIC) Code(s), with description(s):

8. Do you have any areas where you restrict access to site inspectors? If so, what are they and why?

NA

Comments:

II. Financial

1. Which form of management does the firm operate under:

<input type="checkbox"/> Municipality	<input type="checkbox"/> Limited Partnership
<input checked="" type="checkbox"/> Proprietorship	<input type="checkbox"/> Other Partnership
<input type="checkbox"/> Corporation	<input type="checkbox"/> Other

2. What is the firm's Dun & Bradstreet number? *NA*

Parent _____ Facility _____
Please attach the D&B report(s).

3. If management is partnership, list the names and addresses of all partners both general and limited.

NA

4. Attach annual report with certified financial statements. *NA*

5. Attach SEC Form 10K (only applicable in a publicly owned corporation). *NA*

6. Attach a copy of the following: (if available) *NA*

a. The documentation submitted to the EPA Regional Administrator (RA) or the State as evidence of satisfying the EPA financial assurance mechanism for liability insurance and closure (and post-closure, if applicable) of facilities who are regulated under RCRA;

b. A letter sent to the RA or the State signed by the chief financial officer that includes required data from the independently audited, year-end financial statement;

c. An independent CPA's report on examination of the financial statements for the last completed fiscal year; and

d. A special report from the owner's or operator's independent CPA to the owner or operator stating that: 1) the accountant has compared the data with the letter from the chief financial officer specified as having been derived from the independently audited, year-end financial statements for the latest fiscal year with the amounts in such financial statements, and 2) no matters came to his attention which caused him to believe that the specified data should be adjusted.

7. Attach a copy of the company's standard waste disposal contract. *NA*

8. What is the firm's policy on indemnification by the parent corporation for acts of individual sites/subsidiaries?

NA

9. What is the firm's current bond rating (only applicable in publicly-owned corporation)?

NA

Standard & Poors: _____ Moody's: _____

10. Does the site have general liability or environmental impairment insurance? YES ☒ NO _____

general liability only

For both policies:

a. Who is the carrier? _____

b. How long has the policy been in place? _____

c. Has any claim been made against the policy? YES _____ NO _____

d. By whom, when, and nature of claims?

e. What are the policy limits? (e.g., \$3 million per occurrence and \$6 million annual aggregate)

f. What were the policy limits for the three previous years?

12. Have any insurance policies been terminated, cancelled or refused renewal by any of the insurance carriers? YES _____ NO _____

Please explain:

13. Provide copies of certificates of insurance.

14. Did any insurance carrier have an independent engineering/risk assessment audit performed before issuing any of the insurance policies listed above? YES _____ NO _____

If yes, please provide us with a copy of this report?

III. Administrative

1. Please describe the facility's management chain-of-command or attach an organization chart.

F. J. Doyle

2. Please describe the background/experience/training of the facility's management. Include at a minimum the facility's general manager, sales director, technical director and laboratory director. If available, attaching resumes is sufficient.

NA

3. How many employees are there and what is the breakdown by department?

3 - Doyle, his son and son-in-law

4. For the past three (3) years, please provide the total number of full-time and part-time (each) employees at the start of each year by major departments (e.g., sales, lab, technical, and office). Any consistent accounting year is satisfactory.

3 total

5. What is the annual employee turnover rate for the past three years?

0

6. Please provide the names and telephone numbers of the person(s) responsible for each of the following:

a. General Manager:

F.J. Doyle

b. Technical Operations:

c. Sales/Marketing:

d. Laboratory/Quality Control:

e. Permits/Regulatory Compliance:

(1) Environmental:

(2) DOT:

(3) OSHA:

f. Security:

g. Emergency Response:

h. Personnel Training:

Comments:

Same as above

IV. Regulatory

1. What is your EPA RCRA I.D. No.? *does not have state or federal #'s*
2. Please list all applicable permits from federal, state, or municipal authorities governing discharges into water or air, and treatment, storage, and disposal, or transport of wastes. Attach copies.

Please send a copy of the RCRA Part A permit application and a copy of the General Facility Description section from the Part B application.

3. Provide names and telephone numbers of the environmental regulatory officials, from each of the permit agencies above, with whom the facility's management deal. Include both an enforcement/inspection and a permit writer/reviewer from each agency.

Texas Air Control Board

Ft. Worth

(817) 732-5531

Construction permit #S-18612

4. Has the facility or any of its employees been charged with non-compliance of any permit or had any fine or penalty imposed within the last three (3) years?

no

Attach copies, or state whether copies will be made available, of any notices relating to any past or present violations, fines, or pending or alleged non-compliance activities.

5. Have there been any allegations of violations made against the facility or its employees? If so, attach copies of allegations or explain below.

*previous burning of material to remove
insulation*

5. Provide a summary of all past (last ten (10) years), current or pending environmental litigation involving the facility, its employees or its parent organization. In preparing this summary, please answer the following:

- a. Are there any previous, current or pending lawsuits against the firm alleging its responsibility for environmental damage to persons, property, or natural resources? YES _____ NO ☒

If so, what are the known details of this litigation?

6. Are there any past, current or pending regulatory actions by federal, state, or local environmental officials that allege the firm's non-compliance with existing environmental regulations, or would require the firm to monitor and/or clean up an existing or ongoing contamination problem? YES _____ NO ☒

If so, what are the known details?

7. Are there any existing on-site or off-site contamination problems (of air, soils, surface or ground water) related to the corporation's activities of which the firm is currently aware, or is in the process of investigating? Yes _____ NO ☒

If so, what are the known details?

8. Have any officers or directors of the facility or its parent corporation been convicted of any state or federal securities violations? YES _____ NO ✓

If so, explain.

Comments:

V. Community Relations

1. What is the name of the newspaper(s) that generally covers the facility? *The Leonard Graphic (weekly)*

Greenville Herald Banner (daily)

2. Please provide five (5) references (name, affiliation, telephone) familiar with the operation of your facility, at least three (3) of which are waste generators who use the facility.

a. *Louisiana Power & Light*

b. *City of Garland*

c. *Public Service of Oklahoma*

d.

e.

3. Please identify at least two (2) of the local emergency response teams (e.g., fire, police, hospital), with the name and telephone of a contact at that organization.

a. *Leonard Volunteer Fire Dept.*

b. *Leonard Police Dept*

other

4. Please identify at least three (3) local officials (elected or appointed), preferably one with general authority (e.g., mayor, selectman, town council members, etc.) and one or more with specific regulatory responsibilities (e.g., zoning board or wetlands commission member, health officer, etc.). Include telephone numbers.

a. *Darvin Nolen - Public Works Director (214) 587-3334*

b. *Lanna Jackson - City Administrator (214) 587-3334*

Comments:

Billy Harold Martin - Mayor

VI. Facility Description

1. General

a. Location: (Show site boundaries on a USGS map)

b. Size:

- (1) Total acreage 100' x 180'
- (2) Acreage dedicated to waste treatment/disposal all
- (3) Acreage vacant but available for waste treatment/disposal

c. Method of waste delivery by Doyle's 18 wheeler

d. Describe former activities on-site (if any) none - vacant lots

e. What wastes are received for treatment/disposal? (Complete attached Table I) drained transformers to be scrapped (< 50 ppm PCB only)

f. What wastes are specifically not handled by this facility, although they may not be excluded under the permit to operate?
Doyle does not except transformer with ≥ 50 ppm PCB

g. What are hours of operation? function of work load

h. How is site access controlled (e.g., describe receiving procedures security fences/barriers, identification of persons entering, etc.)
wood fence with locked gates

i. What is the projected site life? ∞

2. Waste Storage

a. Above-ground Tanks

- (1) Complete Table II, regarding number, size, contents, material, design, etc. of tanks. SPCC plan not required; tank storage
Attach copy of SPCC plan. < 1600 gallons.
- (2) Describe distribution system from receiving point(s) to tanks.

above ground hose and pump (less than 20' run)

TABLE I

General Types of Materials Received

WASTE TYPE	DRUMS OR CONTAINERS	PHYSICAL STATE			MAJOR CUSTOMER (if any)
		LIQUID	SLUDGES	SOLIDS	
Domestic Solid Waste					
Flammable/Combustible					
Heavy Metals					
Biocides					
Acids					
Bases					
Biological					
Oxidizers					
Water Reactives					
Air Reactives					
Persistent Organics					
Infectious					
Asbestos					
Heavy Oil					
PCB's					
Other					

PLACE "X" IN APPROPRIATE BOXES

Above-Ground Tank Storage Information

[illegible]

Is piping underground? If so, what percentage of piping is underground? no

If yes, how often and how is it tested? _____

Fail safe interlocks? no

- (3) Describe distribution system from tanks to ultimate disposal or treatment. pumped from tanks by Scoggins Oil

Sallisaw, Oklahoma

Is piping underground? If so, what percentage of piping is underground? no

If yes, how often and how is it tested? _____

Fail safe interlocks? unknown

Waste Feed Shut-off? unknown

- (4) Are tanks vented through scrubbers or vapor recovery systems? no

- (5) What is the ultimate destination of the rain water runoff in the outdoor tank area? Arnold Creek or unnamed tributary of the So. Sulphur R. depending on routing of drainage caused by Railroad and Main Highway

b. Underground Tanks NA

- (1) Complete Table III regarding number, size, material, age, design, etc. of tanks.

- (2) Identify secondary containment where appropriate _____

- (3) How often, and how are tanks integrity tested? _____

- (4) Describe distribution system from receiving point(s) to tanks.

Is piping underground? If so, what percentage of piping is underground? no

Is piping underground? If so, what percentage of piping is underground? _____

If yes, how often and how is it integrity tested? _____

Is piping underground? If so, what percentage of piping is underground? no

If yes, how often and how is it tested? _____

Fail safe interlocks? no

- (3) Describe distribution system from tanks to ultimate disposal or treatment. pumped from tanks by Scoggins Oil
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Fail safe interlocks? unknown

Waste Feed Shut-off? unknown

- (4) Are tanks vented through scrubbers or vapor recovery systems? no

- (5) What is the ultimate destination of the rain water runoff in the outdoor tank area? Arnold Creek or unnamed tributary
of the So. Sulphur R. depending on routing of drainage
caused by Railroad and main highway

b. Underground Tanks NA

- (1) Complete Table III regarding number, size, material, age, design, etc. of tanks.

- (2) Identify secondary containment where appropriate _____

- (3) How often, and how are tanks integrity tested? _____

- (4) Describe distribution system from receiving point(s) to tanks.

Is piping underground? If so, what percentage of piping is underground? _____

If yes, how often and how is it integrity tested? _____

Fail safe interlocks? _____

- (5) Describe distribution system from tanks to ultimate disposal or treatment. _____

Is piping underground? _____

If yes, how often and how is it tested? _____

Fail safe interlocks? _____

- (6) Are tanks vented through scrubbers or vapor recovery systems? _____

c. Container/Drum Storage (include portable tanks)

- (1) Maximum area dedicated to container/drum storage. _____

- 50' x 100'*
(2) Design of container/drum storage area:

(a) Covered? NO

(b) Impermeable base? NO

(c) Diked? NO

(d) Segregated areas for incompatible materials? _____

NA

- (3) Estimated current number of containers/drums in storage on-site 40 drums of scrap; 10 drums of ash/insulators and

- 50 transformer cans (empty)
(4) Are there warehousing or staging areas off-site? If so, what is the address? NO

(b) What percentage of overall container/drum storage is at this site? 100%

(c) Site permit or EPA I.D. Number for storage. NA

(d) Are any of the containers/drums stored for more than ninety days? If so, what percentage of the containers/drums are stored for longer than ninety days? NA

d. Lagoons or Impoundments NA

- (1) Complete Table IV regarding number, size, contents, design, etc. of lagoons/impoundments.

TABLE III

Underground Tank Storage Information

TANK ID	CAPACITY (gal)	CONTENTS	MATERIAL	CORROSION PROTECTION		AGE
				COATING	CATHODIC SYSTEM	

(2) How is ground water monitored in vicinity of the lagoon/impoundment?

e. Waste Storage Piles (for each) *NA*

(1) Number _____

(2) Contents _____

(3) Volume _____

(4) Base material type _____ Thickness _____

Permeability _____

(5) Runoff control system _____

f. Landfills (for each) *NA*

(1) Area of active landfill _____

Available capacity _____

(2) Area of proposed landfill _____

(3) Area of closed landfills _____

(4) Waste types and quantity: _____

Active _____

Past _____

(5) Are materials fixed or stabilized before landfilling? _____

Describe materials and process _____

(6) Liner specifications (each)

(7) Leachate detection and collection systems (each)

(8) How do you dispose of leachate _____

(9) Thickness and type of cover material (intermediate and final)

TABLE IV

Lagoon/Impoundment Information

[illegible]

(10) Is there ground water monitoring around the perimeter of the landfill? _____

(11) Are on-site disposal contracts carried out under long-term contract or on a lot-by-lot basis? Describe arrangements:

g. Surface water control

For each storage area and type, describe run-off/run-on control and methods of testing and treating collected liquids.

none

3. Waste Treatment NA

a. Does the site have the following processing capabilities?

	<u>Type</u>	<u>Capacity</u>
Oil Recycling	_____	_____
Solvent Reclamation	_____	_____
Oil/Water Separation	_____	_____
Acid/Base Neutralization	_____	_____
Cyanide Destruction	_____	_____
Sludge Dewatering	_____	_____
Sludge Stabilization	_____	_____

} NA

b. For each process, what is done with the following?

Recoverable products _____

Liquid residuals _____

Sludge or solid residuals _____

c. What is the average length of time between the receiving of the waste and the processing? _____

d. What is the site's main waste treatment process? _____

4. Waste Destruction

a. Incineration

(1) Type _____

(2) Capacity _____

(3) Materials Handled _____

(4) Destruction Efficiency _____

(5) Scrubber Efficiency _____

(6) Emission Rates _____

(7) Waste Feed Limits (set by RCRA permit) _____

(8) Has dispersion modeling been conducted for the point source? _____

(9) Fate of scrubber sludge or solid residuals _____

(10) Fate of incineration solid residuals _____

b. Other destruction capacity

Describe process capacity and fate of residuals. burn-out oven;
ash to son's father-in-law's property for
disposal

5. Waste Bulking and Transshipment (repackaging for shipment) NA

a. Are wastes collected at the site for treatment elsewhere? _____

b. Describe type of wastes and any bulking process. _____

- c. Is off-site treatment carried out on a long-term contract or lot-by-lot basis? _____

Describe arrangements. _____

- d. Identify off-site treatment facilities by waste type. _____

6. Electric Equipment Rebuilding and Salvaging

- a. What is the disposal procedure for the waste oil? Include data about the disposal site. Scoggins Oil Sallisaw, Ok.
66

- b. What is the disposal procedure for the scrap metal?
Sold to various junk companies - mostly to
McKinney Junk Co. McKinney, Tx; ash from
burn-out oven to private property land disposal

- c. How is the oil stored while on site? in two above ground
tanks

- d. What are the special handling procedures (if any) for the oil?
None

7. PCB processing (optional-to be filled out by PCB disposers only) NA

- a. What means of processing is used at this site for the materials (oils, waste metals, etc.) contaminated with PCB's (polychlorinated biphenyl's)?

<u>Type</u>	<u>Yearly amount (in lbs, gallons, etc)</u> <u>PCB contaminated material processed</u>
Land filling	
Oil recycling	
Incineration	
Other means of destruction	

- b. List any previous processing practices that are different than those above.
- c. How long has this site processed PCB's?
- d. Attach the site's federal, state, or local permits which regulate the PCB processing at the site.
- e. How is the PCB contaminated material transported to the site?
- f. Attach the transporter's federal, state, or local permit for transporting PCB's (if available).
- g. What is the average length of time between the receiving the PCB contaminated materials and their processing?
- h. Are there any by-products (e.g., air emissions, residues, etc.) generated by the processing of PCB contaminated materials? If so, indicate the engineering controls used to limit any exposure that may occur.

VII. Employee Training (Job) *NA*

1. Initial Training:

a. Upon first employment, what training is provided to the new employee? _____

b. Who is the instructor? _____

What is the instructor's qualifications? _____

c. How is previous employee training verified? _____

d. What on-the-job training is provided? _____

Who is responsible for the on-the-job training? _____

e. How is the comprehension of the training by the employee measured?
(e.g., classroom testing, supervisor's reports, etc.) _____

2. Employee Retraining and Updating:

a. What additional training is provided to employees after the initial training? (e.g., regulation updates, new safety equipment)

b. Who is the instructor? _____

What are the instructor's qualifications? _____

c. How is the comprehension of the training by the employee measured?
(e.g., classroom testing, supervisor's reports, etc.) _____

3. Employee Training at a RCRA Regulated Site NA

- a. What specialized training is provided to the employees who will be handling hazardous wastes?
- b. Who provides the training?
- c. What are the instructor's qualifications?
- d. How is the employee comprehension of the training measured?
- e. What training are the employees given in the wearing of a respirator?
- f. What manner of respirator fit testing is provided for the employees handling the hazardous wastes?

VIII. Site Characterization:

1. Land Use:

- a. Property use and zoning (provide direction from facility)
residential on 3 sides with High School on one side
- b. Are crops grown on adjacent properties? private gardens
Type? _____
- c. Population within 1 mile? _____
Direction to concentrations? SSW
Population within 3 miles? the entire population of Leonard (~1500)
Direction to concentrations? SSW
- d. Location of sensitive receptors (schools, hospitals, etc.)
Type? school Direction? E
Distance? 200 ft.
- e. Prevailing wind direction and speed. NA

2. Surface Water:

a. Nearest River or Stream

- (1) Name Arnold Creek or unnamed tributary of So. Sulphur R.
(2) Distance ≈ 1 mi.
(3) 7 day 10-yr. low flow unknown
(4) Water quality classification unclassified
(5) Uses unknown

b. Drinking Water Source

- (1) Name _____
(2) Distance _____
(3) Population served _____
(4) Other downstream data _____

c. Nearest Reservoir/Lake

- (1) Name Lavon (Arnold Cr. drainage)
(2) Distance 17 mi.
(3) Volume 956,500 ac-ft
(4) Water quality classification public water supply
(5) Use _____

- (1) Lake Texarkana (So. Sulphur R. drainage)
(2) 112 mi.
(3) 145,300 ac-ft
(4) public water supply

d. Flooding

- (1) Is any part of the facility located within the 100-year flood plain or a coastal high hazard zone? NO
- (2) If yes, describe flood protection for active and inactive areas NA
- (3) Has the site sustained any past flood damage? NO
Describe _____

e. Monitoring

- (1) Is surface water monitored at the facility? NO
- (2) If yes, describe location and parameters used.

3. Ground Water:

- a. Depth to water table? _____
- b. Depth to usable aquifer? _____ Name _____
- c. Distance to nearest down gradient high capacity well? 2 blocks
What is the well used for? municipal water supply (1700' deep)
- d. Distance to nearest low capacity well (domestic)? < 2 blocks
- e. Is site in an aquifer recharge zone? NO
- f. Surficial material at site? Gober Chalk
Type? _____ Thickness? ≈ 400'
- g. Impermeable layers - formation name _____
Depth _____ Material; _____
Thickness _____ (for each)
- h. Aquifers - Formation Name _____
Depth _____ Material; _____
Thickness _____ Usage _____ (for each)

i. Within 3 miles of the site has there been:

(1) extensive ground water use for a long period of time? yes

(2) oil or mineral borings? unknown

j. Has ground water modeling been carried out for the site? no

If yes, Title of Report and Author _____

k. Describe the general geohydrologic setting _____

l. Ground Water monitoring

Number of Wells none

Frequency of Monitoring _____

Parameters Monitored _____

IX. Source Information

1. Air

a. Identify potential sources of airborne emissions associated with the site burn-out oven

(1) Point sources:

Incinerators _____
Scrubbers _____
Vents _____
Tank Vents _____

(2) Fugitive:

Storage piles _____
Lagoons _____
Building Vents _____

b. Identify and quantify control technology for each source. none

c. Does the site have federal, state or local air emission permits or licenses? yes If yes, please list all permits and licenses by source and include permit numbers and permissible emission guidelines.

<u>Source</u>	<u>Permit or License No.</u>	<u>Permissible Emissions</u>
burn-out oven	Construction permit #5-18612 issued 8-10-88	

d. Does the site meet its permit emissions standards? _____ If no, please identify the emission standard(s) not being met and indicate engineering controls (if any) being undertaken to control the contaminant(s).

Doyle has not request operating permit; however the burn-out oven is in use.

- e. Identify control technology for each source. all material burned must have documentation that it was < 50 ppm PCB; feed to oven must be < 10% combustible material; temperature controls; ash handled in such a manner as not to become air borne.
- f. Has air dispersion modeling been done for routine and emergency conditions? NO
- _____
- _____
- _____

If yes, please provide report.

2. Water

- a. Identify sources of waste water originating at the site. storm water runoff only
- b. Identify approximate volume from each source and major chemical constituents or properties. NA
- c. Identify the fate of each stream. See VIII (2)(a)

(1) Small volumes collected on drums or tanks for off-site treatment. Identify ultimate disposal.

(2) If wastewater is conveyed by sewer to on-site or off-site treatment/disposal, Identify: NA

(a) Ownership of sewer (municipal or client)

(b) Age and construction material of sewer system

(c) Has integrity of sewer system been checked within last 3 years? If yes, when, how, and results.

NA

(d) Does the site meet its effluent guidelines? ____ If no, please identify the effluent guideline not being met and indicate engineering controls (if any) being undertaken to control the contaminant(s).

NA

(e) Does the site have federal, state or local waste water discharge permits or licenses? NO If yes, please list all permits and licenses for each outfall and include permit numbers and effluent guidelines.

<u>Outfall</u>	<u>Permit or License No.</u>	<u>Effluent Guidelines</u>
----------------	----------------------------------	--------------------------------

3. Laboratory

NO lab

a. Are there on-site analytical capabilities? If yes, complete the next sections for that lab. If no, complete the next sections for the lab that does the analyses.

b. List of major analytical equipment (e.g., G/C, A/A, etc.)

c. Types of analyses performed by the lab (e.g., GC, AA, etc.)

d. Qualifications of the lab director and chemists _____

e. Describe chain of custody procedure and attach a copy of the form.

f. What laboratory does the analytical certification? _____

insulation of oil from being out go to son's father in law's pool

✓ tanks filled from here above round
shop bldg size 40x60

TACB permit - burn out oven

✓ all drained before shipped to Payco

✓ 900 & 500 gal tanks for waste oil to Seroggen

✓ 100' x 180'
gravel lot

no underground tanks

✓ McKinney iron & metal for scrap

✓ 3 employees

✓ wood fence all around with locked gates
general liability \$1x10⁶

high school * st on E

elementary school 1 1/2 SW

1 municipal well, 1700' dia
sh 2 to 1 1/2 W

Louisiana P & L

PSO

City of Garland

reg. with H & P

on site since 75 was vacant prior to 75
in city limits

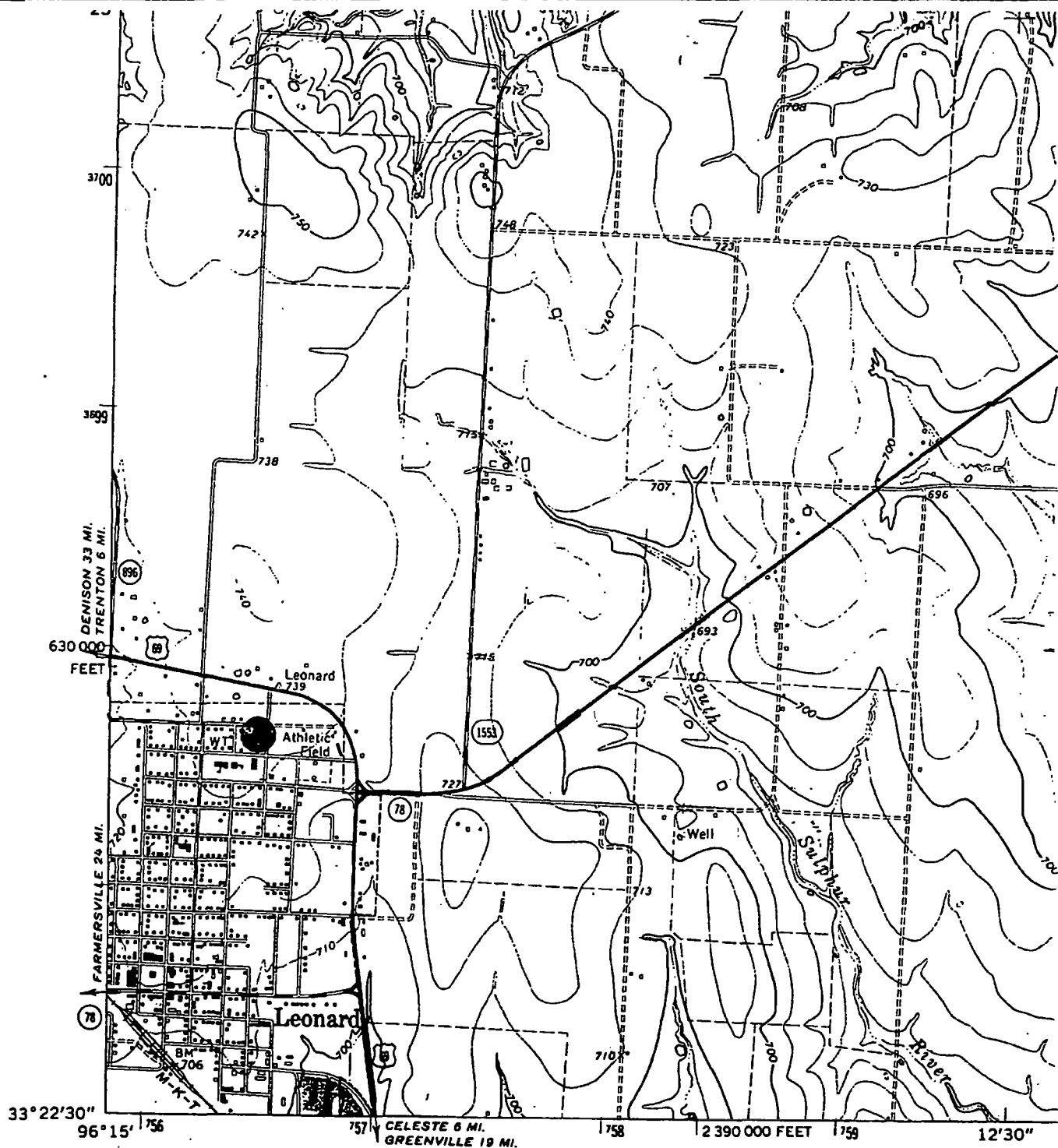
each transformer by PSO & LPL is tested for PCB

Nothing be built - everything scraped

Fannin County Appraisal District: Wylma Dunn (4-7-89)
(214) 583-9546

Owner	Property ID	Current through	Appraised value
Frank J. Doyle	0783-019-0000-02	1988	\$44,430
" "	9030-014-00034-02 *	1988	57,860
" "	9030-014-0005A-02	1988	3,560
" "	9030-014-0007A-02	1988	6,440
" "	9030-013-0005A-02	1988	21,010

* homestead



(PIKE)
6750 IV SE

Mapped, edited, and published by the Geological Survey

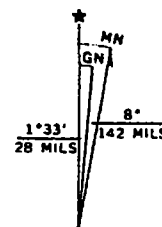
Control by USGS and USC&GS

Topography by photogrammetric methods from aerial photographs taken 1964. Field checked 1964

Polyconic projection. 1927 North American datum
10,000-foot grid based on Texas coordinate system,
north central zone

1000-meter Universal Transverse Mercator grid ticks,
zone 14, shown in blue

Fine red dashed lines indicate selected fence lines



UTM GRID AND 1964 MAGNETIC NORTH
DECLINATION AT CENTER OF SHEET

FC

Leonard, Tx Quad

000244

file copy

*new: Transformer Repair Shop
F. J. Doyle*

Southwestern Electric Power Company

ENVIRONMENTAL SERVICES
DEPARTMENT

APR 6 1989

FOR COMPANY BUSINESS ONLY

SUBJECT F. J. Doyle Company

DATE July 29, 1986

LOCATION Leonard, Texas

Mr. J. A. Pruett

I spoke with Mr. Doyle today concerning a visit to his company. He welcomes our visit and advises that he is located on Highway 69 approximately 32 miles southeast of Denison, Texas. He also stated that he has purchased transformers from us for many years.

Sincerely,

Robert D. Mabry

Robert D. Mabry

*~~10:00 am~~
9:00 am*

dmd

xc: R. P. Nix
T. J. Epperson

Doyle
call Tuesday
214/587-3342

*100 mi
82*

*121 North to 635 E - us 75 (Skinner) 9' north
to McKinney to 121 90 N.E.
90 20 to Hwy 69 (Trenton)
90 right going east
6 mile Leonard - on main
stop at Exxon (on right)
& call*

F. J. Doyle Transformer
Repair Shop

10-8-86

good order transformers sold to transformer rewind shop
see references (Drenville, Lone Star)

no outside liquid storage

no oil residue outside

inside no oil spills

payee into transformer covers + roll

to Las Vegas 3 times/yr, 2 cables

- when advised of LUST reg (from owner gas station)

said they'd never find us

- said have had a few minor oil spills in past - asked how
cleaned up - said just let rain wash away

10W: Transformer Repair
Shops - F. J. Doyle

APPENDIX A
FACILITY QUESTIONNAIRE FORM

NOTICE

The following questionnaire has been designed to be used in conjunction with an inspection of each site being audited. The questionnaire is broad in its approach and the topics covered; those using the questionnaire should, therefore, focus their specific areas of concern by adapting the questionnaire for their own use.

C. CITY QUESTIONNAIRE

INTRODUCTION

We appreciate your cooperation in completing this questionnaire. If you handwrite your responses, please be as legible as possible. If you have already prepared summaries or other documents that answer some of the questions, you can attach them to this form (but please indicate after the question that you have done so and reference the attachment and page number in which the information can be found). Where we ask for quantities or distances, best estimates are acceptable.

Improving this questionnaire is an on-going effort. If you have any recommendations for information that should be added or deleted (or questions rephrased), please give us your comments at the end of the section. Thank you for your cooperation.

Name of person(s) completing this form:

Jay A. Pruett

Title: *Mgr. of Env. Affairs*

Telephone:

Date: *10-8-86*

I. General Information

1. Facility name, mailing address, and telephone number:

F. J. Doyle (Frank)

Box 312

Leonard TX 75452

(214) 587-3342

2. Location/address (if different):

No address

Cottonwood - behind Leonard High School

3. Principal contact(s), title(s), and telephone number(s):

F. J. Doyle

Owner

none

4. Type of facility (check all applicable):

- | | |
|--|---|
| a. <input type="checkbox"/> Co-disposal landfill | g. <input type="checkbox"/> Detoxification/chemical treatment |
| b. <input checked="" type="checkbox"/> Secure landfill | h. <input type="checkbox"/> Solvent recovery/recycle |
| c. <input type="checkbox"/> Aqueous treatment | i. <input type="checkbox"/> Broker/transshipment/bulk storage |
| d. <input type="checkbox"/> Incineration | j. <input type="checkbox"/> Oil recovery/recycle |
| e. <input type="checkbox"/> Biological treatment | k. <input type="checkbox"/> PCBs >50 ppm accepted at the facility |
| f. <input type="checkbox"/> Solar evaporation | l. <input checked="" type="checkbox"/> Other (describe) <u>transformers, capacitors, etc. - salvage</u> |

5. List the owners of the facility and their mailing addresses.

none

6. If the facility is a subsidiary, what is the name, address, principal contact(s), and telephone number(s) of the parent corporation/organization?

N/A

7. List the facility' (and parent's) four digit Standard Industrial Classification (SIC) code(s), with description(s):

8. Do you have any areas where you restrict access to site inspectors? If so, what are they and why?

No.

Comments:

II. Financial

1. Which form of management does the firm operate under:

<input type="checkbox"/> Municipality	<input type="checkbox"/> Limited Partnership
<input checked="" type="checkbox"/> Proprietorship	<input type="checkbox"/> Other Partnership
<input type="checkbox"/> Corporation	<input type="checkbox"/> Other

2. What is the firm's Dun & Bradstreet number?

Parent _____ Facility _____
Please attach the D&B report(s).

3. If management is partnership, list the names and addresses of all partners both general and limited.

N/A

4. Attach annual report with certified financial statements. N/A

5. Attach SEC Form 10K (only applicable in a publicly owned corporation). N/A

6. Attach a copy of the following: (if available) N/A

- a. The documentation submitted to the EPA Regional Administrator (RA) or the State as evidence of satisfying the EPA financial assurance mechanism for liability insurance and closure (and post-closure, if applicable) of facilities who are regulated under RCRA;
- b. A letter sent to the RA or the State signed by the chief financial officer that includes required data from the independently audited, year-end financial statement;
- c. An independent CPA's report on examination of the financial statements for the last completed fiscal year; and
- d. A special report from the owner's or operator's independent CPA to the owner or operator stating that: 1) the accountant has compared the data with the letter from the chief financial officer specified as having been derived from the independently audited, year-end financial statements for the latest fiscal year with the amounts in such financial statements, and 2) no matters came to his attention which caused him to believe that the specified data should be adjusted.

7. Attach a copy of the company's standard waste disposal contract.

None

8. What is the firm's policy on indemnification by the parent corporation for acts of individual sites/subsidiaries?

N/A

9. What is the firm's current bond rating (only applicable in publicly-owned corporation)? N/A

Standard & Poors: _____ Moody's: _____

10. Does the site have general liability or environmental impairment insurance? YES _____ NO ☒

For both policies:

a. Who is the carrier? _____

b. How long has the policy been in place? _____

c. Has any claim been made against the policy? YES _____ NO _____

d. By whom, when, and nature of claims?

e. What are the policy limits? (e.g., \$3 million per occurrence and \$6 million annual aggregate)

f. What were the policy limits for the three previous years?

12. Have any insuranc policies been terminated, ceiled or refused renewal by any of the insurance carriers? YES _____ NO ☒

Please explain:

13. Provide copies of certificates of insurance. N/A

14. Did any insurance carrier have an independent engineering/risk assessment audit performed before issuing any of the insurance policies listed above? YES _____ NO _____

If yes, please provide us with a copy of this report?

N/A

III. Administrative

1. Please describe the facility's management chain-of-command or attach an organization chart.

F. J. Doyle

no other

2. Please describe the background/experience/training of the facility's management. Include at a minimum the facility's general manager, sales director, technical director and laboratory director. If available, attaching resumes is sufficient.

Jack business 1974
transformers since '75-'76

began - removing abandon telephone wire

3. How many employees are there and what is the breakdown by department?

One - F. J. Doyle

(Mr. Doyle's father was working this date)

4. For the past three (3) years, please provide the total number of full-time and part-time (each) employees at the start of each year by major departments (e.g., sales, lab, technical, and office). Any consistent accounting year is satisfactory.

Part-time laborer occasionally

5. What is the annual employee turnover rate for the past three years?

see above
none in last year

6. Please provide the names and telephone numbers the person(s) responsible for each of the following:

a. General Manager:

none - F. J. Doyle.

b. Technical Operations:

c. Sales/Marketing:

d. Laboratory/Quality Control:

e. Permits/Regulatory Compliance:

(1) Environmental:

(2) DOT:

(3) OSHA:

f. Security:

g. Emergency Response:

h. Personnel Training:

Comments:

IV. Regulatory

1. What is your EPA RCRA I.D. No.?

No EPA #

2. Please list all applicable permits from federal, state, or municipal authorities governing discharges into water or air, and treatment, storage, and disposal, or transport of wastes. Attach copies.

No permits - knows of none required

Please send a copy of the RCRA Part A permit application and a copy of the General Facility Description section from the Part B application.

3. Provide names and telephone numbers of the environmental regulatory officials, from each of the permit agencies above, with whom the - facility's management deal. Include both an enforcement/inspection and a permit writer/reviewer from each agency.

*Plans to get a furnace to burn insulation
off wire - contact w/ TACS on this
↳ Melvin Lewis*

4. Has the facility any of its employees be charged with non-compliance of any permit or had any fine or penalty imposed within the last three (3) years? *N.A.*

Attach copies, or state whether copies will be made available, of any notices relating to any past or present violations, fines, or pending or alleged non-compliance activities.

5. Have there been any allegations of violations made against the facility or its employees? If so, attach copies of allegations or explain below.

TACB stopped burning of insulation at different locations - 3 wks ago.

5. Provide a summary of all past (last ten (10) years), current or pending environmental litigation involving the facility, its employees or its parent organization. In preparing this summary, please answer the following: None

- a. Are there any previous, current or pending lawsuits against the firm alleging its responsibility for environmental damage to persons, property, or natural resources? YES _____ NO _____

If so, what are the known details of this litigation?

6. Are there any past, current or pending regulatory actions by federal, state, or local environmental officials that allege the firm's non-compliance with existing environmental regulations, or would require the firm to monitor and/or clean up an existing or ongoing contamination problem? YES _____ NO ✓

If so, what are the known details?

7. Are there any existing on-site or off-site contamination problems (of air, soils, surface or ground water) related to the corporation's activities of which the firm is currently aware, or is in the process of investigating? Yes _____ NO ✓

If so, what are the known details?

8. Have any officers or directors of the facility or its parent corporation been convicted of any state or federal securities violations? YES _____ NO _____

If so, explain.

N/A

Comments:

V. Community Relations

1. What is the name of the newspaper(s) that generally covers the facility?

Leonard Graphic - weekly

2. Please provide five (5) references (name, affiliation, telephone) familiar with the operation of your facility, at least three (3) of which are waste generators who use the facility.

a. *PSO - Rick Shatto (918) 599-2218*
Transformer Dept

b. *City of Garland*
Jack Lavender (214) 494-7305

c. *Greenville Transformer Rewinding shop*
C. Pickens (214) 455-1610

d. *Lone Star Transformer Sales*
Ken Miller (214) 454-2959

e.

3. Please identify at least two (2) of the local emergency response teams (e.g., fire, police, hospital), with the name and telephone of a contact at that organization.

a. *Leonard Volunteer Fire Dept*

b. *Leonard Police Dept*

other

4. Please identify at least three (3) local officials (elected or appointed), preferably one with general authority (e.g., mayor, selectman, town council members, etc.) and one or more with specific regulatory responsibilities (e.g., zoning board or wetlands commission member, health officer, etc.). Include telephone numbers.

a. *Billy Martin - mayor of Leonard*

b.

Comments:

VI. Facility Description

1. General

a. Location: (Show site boundaries on a USGS map)

b. Size:

- (1) Total acreage 2 lots 100' x 155'
(2) Acreage dedicated to waste treatment/disposal all
(3) Acreage vacant but available for waste treatment/disposal none

c. Method of waste delivery truck (mostly self pick up) but occasion 18-whe

d. Describe former activities on-site (if any) born w/ horses

e. What wastes are received for treatment/disposal? (Complete attached Table I)

f. What wastes are specifically not handled by this facility, although they may not be excluded under the permit to operate?

Cigarettes, PCB-contaminated oil (not licensed)

g. What are hours of operation? whenever

h. How is site access controlled (e.g., describe receiving procedures security fences/barriers, identification of persons entering, etc.)

building locked, no control over yard

i. What is the projected site life? unknown

2. Waste Storage

a. Above-ground Tanks

Two tanks

(1) Complete Table II regarding number, size, contents, material, design, etc. of tanks.

Attach copy of SPCC plan.

(2) Describe distribution system from receiving point(s) to tanks.

No distribution system - holding tank only

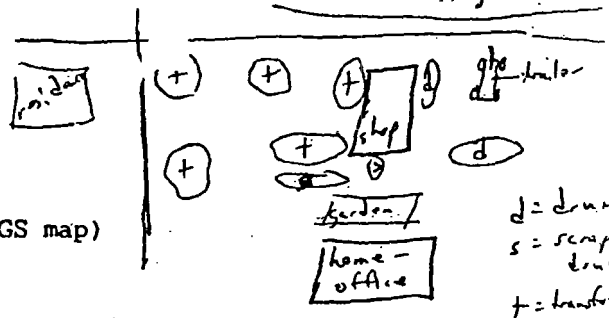


TABLE I

General Types of Materials Received

WASTE TYPE	DRUMS OR CONTAINERS	PHYSICAL STATE			MAJOR CUSTOMER (if any)
		LIQUID	SLUDGES	SOLIDS	
Domestic Solid Waste					
Flammable/Combustible					
Heavy Metals					
Biocides					
Acids					
Bases					
Biological					
Oxidizers					
Water Reactives					
Air Reactives					
Persistent Organics					
Infectious					
Asbestos					
Heavy Oil					
PCB's					
Other <i>Tropfenman</i>	<i>Loose</i>			✓	<i>P50</i> <i>2/7</i> <i>Garland</i>

PLACE "X" IN APPROPRIATE BOXES

Above-Ground Tank Storage Information

[illegible]

* dirt floor, no curb, no containment

Is piping underground? If so, what percentage of piping is underground? No

If yes, how often and how is it tested? —

Fail safe interlocks? —

- (3) Describe distribution system from tanks to ultimate disposal or treatment. Tank by itself - no rush system

Is piping underground? If so, what percentage of piping is underground? N/A

If yes, how often and how is it tested? —

Fail safe interlocks? —

Waste Feed Shut-off? —

- (4) Are tanks vented through scrubbers or vapor recovery systems?

No. Hole in top for filling

- (5) What is the ultimate destination of the rain water runoff in the outdoor tank area? (Inside)

b. Underground Tanks

No underground tanks

- (1) Complete Table III regarding number, size, material, age, design, etc. of tanks.

- (2) Identify secondary containment where appropriate —

- (3) How often, and how are tanks integrity tested? —

- (4) Describe distribution system from receiving point(s) to tanks.

Is piping underground? If so, what percentage of piping is underground? —

If yes, how often and how is it integrity tested? —

Fail safe interlocks? _____

- (5) Describe distribution system from tanks to ultimate disposal or treatment. _____

Is piping underground? _____

If yes, how often and how is it tested? _____

Fail safe interlocks? _____

- (6) Are tanks vented through scrubbers or vapor recovery systems?

c. Container/Drum Storage (include portable tanks)

- (1) Maximum area dedicated to container/drum storage. 2 lots (portion)

- (2) Design of container/drum storage area:

*Drums contain scrap iron, wire,
etc. only - no liquids*

- (a) Covered? No
(b) Impermeable base? No
(c) Diked? No
(d) Segregated areas for incompatible materials? No

- (3) Estimated current number of containers/drums in storage on-site ~30

- (4) Are there warehousing or staging areas off-site? If so, what is the address? No off-site storage

(b) What percentage of overall container/drum storage is at this site? —

(c) Site permit or EPA I.D. Number for storage.
—

- (d) Are any of the containers/drums stored for more than ninety days? If so, what percentage of the containers/drums are stored for longer than ninety days? —

d. Lagoons or Impoundments

No ponds or lagoons

- (1) Complete Table IV regarding number, size, contents, design, etc. of lagoons/impoundments.

TABLE III

Underground Tank Storage Information

TANK ID	CAPACITY (gal)	CONTENTS	MATERIAL	CORROSION PROTECTION		AGE
				COATING	CATHODIC SYSTEM	
		N/A - No underground tanks				

(2) How is ground water monitored in vicinity of the lagoon/impoundment?

e. Waste Storage Piles (for each) *No waste storage piles*

(1) Number _____

(2) Contents _____

(3) Volume _____

(4) Base material type _____ Thickness _____

Permeability _____

(5) Runoff control system _____

f. Landfills (for each) *No land fill*

(1) Area of active landfill _____

Available capacity _____

(2) Area of proposed landfill _____

(3) Area of closed landfills _____

(4) Waste types and quantity: _____

Active _____

Past _____

(5) Are materials fixed or stabilized before landfilling? _____

Describe materials and process _____

(6) Liner specifications (each)

(7) Leachate detection and collection systems (each)

(8) How do you dispose of leachate _____

(9) Thickness and type of cover material (intermediate and final)

TABLE IV

Lagoon/Impoundment Information

[illegible]

A-22

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(10) Is there groundwater monitoring around the perimeter of the landfill? _____

(11) Are on-site disposal contracts carried out under long-term contract or on a lot-by-lot basis? Describe arrangements:

g. Surface water control

For each storage area and type, describe run-off/run-on control and methods of testing and treating collected liquids.

None

3. Waste Treatment

a. Does the site have the following processing capabilities?

	<u>Type</u>	<u>Capacity</u>
Oil Recycling	_____	_____
Solvent Reclamation	_____	_____
Oil/Water Separation	_____	_____
Acid/Base Neutralization	_____	_____
Cyanide Destruction	_____	_____
Sludge Dewatering	_____	_____
Sludge Stabilization	_____	_____

b. For each process, what is done with the following?

Recoverable products McKinnis Junk Co - McKinnis, TX
- copper, iron, brass, aluminum

Liquid residuals oil - sell to John Scroggins (918) 775-2748
Salina, Okla - picks up all types of oil - "cleaned"

Sludge or solid residuals No other waste, residuals at all

c. What is the average length of time between the receiving of the waste and the processing? may be a year

d. What is the site's main waste treatment process? tear down of transformers

4. Waste Destruction

a. Incineration N/A

(1) Type _____

(2) Capacity _____

(3) Materials Handled _____

(4) Destruction Efficiency _____

(5) Scrubber Efficiency _____

(6) Emission Rates _____

(7) Waste Feed Limits (set by RCRA permit) _____

(8) Has dispersion modeling been conducted for the point source? _____

(9) Fate of scrubber sludge or solid residuals _____

(10) Fate of incineration solid residuals _____

b. Other destruction capacity

Describe process capacity and fate of residuals. _____

5. Waste Bulking and Transshipment (repackaging for shipment) N/A

a. Are wastes collected at the site for treatment elsewhere? _____

b. Describe type of wastes and any bulking process. _____

- c. Is off-site treatment carried out on a long term contract or lot-by-lot basis. _____

Describe arrangements. _____

- d. Identify off-site treatment facilities by waste type. _____

6. Electric Equipment Rebuilding and Salvaging

- a. What is the disposal procedure for the waste oil? Include data about the disposal site. To Scraggin Oil Service -
processes for use as fuel, also as "floor sweep"

- b. What is the disposal procedure for the scrap metal?
to McKinney Scrap.

- c. How is the oil stored while on site? in two tanks inside

- d. What are the special handling procedures (if any) for the oil?
none

7. PCB processing (optional-to be filled out by PCB disposers only)

- Does not knowingly handle PCB's
a. What means of processing is used at this site for the materials (oils, waste metals, etc.) contaminated with PCB's (polychlorinated biphenyl's)?

Type	Yearly amount (in lbs, gallons, etc) PCB contaminated material processed
Land filling	N/A
Oil recycling	N/A
Incineration	N/A
Other means of destruction	N/A

relies on generators to not send PCB equipment
Does not believe gets any now.

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Wife said they got stung once in the past for this too.

- b. List any previous processing practices that are different than those above.

*moved tanks inside
Not burn any more*

- c. How long has this site processed PCB's?

- d. Attach the site's federal, state, or local permits which regulate the PCB processing at the site.

- e. How is the PCB contaminated material transported to the site?

- f. Attach the transporter's federal, state, or local permit for transporting PCB's (if available).

- g. What is the average length of time between the receiving the PCB contaminated materials and their processing?

- h. Are there any by-products (e.g., air emissions, residues, etc.) generated by the processing of PCB contaminated materials? If so, indicate the engineering controls used to limit any exposure that may occur.

VII. Employee Training (Job) *N/A*

1. Initial Training:

- a. Upon first employment, what training is provided to the new employee? _____

- b. Who is the instructor? _____
What is the instructor's qualifications? _____

- c. How is previous employee training verified? _____

- d. What on-the-job training is provided? _____

- Who is responsible for the on-the-job training? _____

- e. How is the comprehension of the training by the employee measured?
(e.g., classroom testing, supervisor's reports, etc.) _____

2. Employee Retraining and Updating: *N/A*

- a. What additional training is provided to employees after the initial training? (e.g., regulation updates, new safety equipment)

- b. Who is the instructor? _____
What are the instructor's qualifications? _____

- c. How is the comprehension of the training by the employee measured?
(e.g., classroom testing, supervisor's reports, etc.) _____

3. Employee Training RCRA Regulated Site N/.

- a. What specialized training is provided to the employees who will be handling hazardous wastes?
- b. Who provides the training?
- c. What are the instructor's qualifications?
- d. How is the employee comprehension of the training measured?
- e. What training are the employees given in the wearing of a respirator?
- f. What manner of respirator fit testing is provided for the employees handling the hazardous wastes?

VIII. Site Characterization

1. Land Use:

- a. Property use and zoning (provide direction from facility)

Don't know - residential all around site
constant from neighbors on aesthetic - west side
high school across street? No fence or barrier

- b. Are crops grown on adjacent properties?

gardens only

Type? _____

- c. Population within 1 mile?

residential

Direction to concentrations?

all around

Population within 3 miles? _____

Direction to concentrations? _____

- d. Location of sensitive receptors (schools, hospitals, etc.)

Type? high school Direction? north
Distance? across street

- e. Prevailing wind direction and speed.

south

2. Surface Water:

- a. Nearest River or Stream

(1) Name drainage ditch to unnamed creek
(2) Distance was in front of lot
(3) 7 day 10-yr. low flow _____
(4) Water quality classification _____
(5) Uses _____

- b. Drinking Water Source

(1) Name Leonard Water Supply - wells
(2) Distance 1 block
(3) Population served 1800
(4) Other downstream data _____

- c. Nearest Reservoir/Lake

(1) Name _____
(2) Distance _____
(3) Volume _____
(4) Water quality classification _____
(5) Use _____

d. Flooding

- (1) Is any part of the facility located within the 100-year flood plain or a coastal high hazard zone? Don't think so.
- (2) If yes, describe flood protection for active and inactive areas no flood problem
- (3) Has the site sustained any past flood damage? None

e. Monitoring

- (1) Is surface water monitored at the facility? No
- (2) If yes, describe location and parameters used.

3. Ground Water:

- a. Depth to water table? unknown
- b. Depth to usable aquifer? very deep Name unknown
- c. Distance to nearest down gradient high capacity well? 1 block
What is the well used for? city water supply
- d. Distance to nearest low capacity well (domestic)? —
- e. Is site in an aquifer recharge zone? unknown
- f. Surficial material at site?
Type? unknown Thickness? —
- g. Impermeable layers - formation name unknown
Depth — Material; —
Thickness — (for each)
- h. Aquifers - Formation Name unknown
Depth — Material; —
Thickness — Usage — (for each)

i. Within 3 miles of the site has there been:

(1) extensive ground water use for a long period of time? _____

yes

(2) oil or mineral borings? unknown

j. Has ground water modeling been carried out for the site? _____

No

If yes, Title of Report and Author _____

k. Describe the general geohydrologic setting _____

unknown

l. Ground Water monitoring

Number of Wells None

Frequency of Monitoring _____

Parameters Monitored _____

IX. Source Information

1. Air

a. Identify potential sources of airborne emissions associated with the site No air emission since stopped burning 3 weeks ago

(1) Point sources:

Incinerators Future from insulation burning - TACIS (Mailing Lewis)
Scrubbers _____
Vents _____
Tank Vents _____
Interested in burning gas - looking into

(2) Fugitive: None

Storage piles _____
Lagoons _____
Building Vents _____

b. Identify and quantify control technology for each source. None

c. Does the site have federal, state or local air emission permits or licenses? No If yes, please list all permits and licenses by source and include permit numbers and permissible emission guidelines.

<u>Source</u>	<u>Permit or License No.</u>	<u>Permissible Emissions</u>
---------------	------------------------------	------------------------------

d. Does the site meet its permit emissions standards? N/A If no, please identify the emission standard(s) not being met and indicate engineering controls (if any) being undertaken to control the contaminant(s).

e. Identify control technology for each source. _____

f. Has air dispersion modeling been done for routine and emergency conditions? _____

If yes, please provide report.

2. Water

a. Identify sources of waste water originating at the site.

None - stormwater only - uncontrolled

b. Identify approximate volume from each source and major chemical constituents or properties.

c. Identify the fate of each stream.

(1) Small volumes collected on drums or tanks for off-site treatment. Identify ultimate disposal.

N/A

(2) If wastewater is conveyed by sewer to on-site or off-site treatment/disposal, Identify: *N/A*

(a) Ownership of sewer (municipal or client)

(b) Age and construction material of sewer system

(c) Has integrity of sewer system been checked within last 3 years? If yes, when, how, and results.

(d) Does the site meet its effluent guidelines? N/A If no, please identify the effluent guideline not being met and indicate engineering controls (if any) being undertaken to control the contaminant(s).

(e) Does the site have federal, state or local waste water discharge permits or licenses? No If yes, please list all permits and licenses for each outfall and include permit numbers and effluent guidelines.

Outfall

Permit or
License No.

Effluent
Guidelines

None

3. Laboratory

a. Are there on-site analytical capabilities? No If yes, complete the next sections for that lab. If no, complete the next sections for the lab that does the analyses.

b. List of major analytical equipment (e.g., G/C, A/A, etc.)

N/A

c. Types of analyses performed by the lab (e.g., GC, AA, etc.)

N/A

d. Qualifications of lab director and chemists _____

e. Describe chain of custody procedure and attach a copy of the form.

f. What laboratory does the analytical certification? _____

Records -

No records of waste - in

Tox records as to who bought from only

SPCC -

- None

VENDOR ENVIRONMENTAL AUDIT REPORT

Doyle & Sons Transformers
905 North Poplar
Leonard, Texas 75452



VENDOR ENVIRONMENTAL AUDIT REPORT

DOYLE & SONS TRANSFORMERS

**905 NORTH POPLAR STREET
LEONARD, TX 75452**

Prepared by:



**Environmental Services
Dallas, Texas**

April 1999

The information contained in this environmental vendor audit report is privileged and confidential and is intended only for the use of Central and South West Corporation and its subsidiaries. Any use, dissemination, distribution or copying of this report is strictly prohibited.

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1. EXECUTIVE SUMMARY

A representative of Central and South West (CSW) Environmental Audits and Environmental Health, performed a vendor environmental audit of Doyle and Sons Transformers (Doyle & Sons) on November 11, 1997. Doyle & Sons was previously audited by CSW in 1989, 1991, and 1993. The purpose of this audit was to continue the periodic evaluation of the company as a vendor conducting business with CSW operating companies. This report was developed to assist in the long-term evaluation of potential risk and liability associated with using Doyle & Sons as a vendor of choice.

Doyle & Sons is a privately owned transformer salvaging company located in a mixed use area within the city limits of Leonard, Texas. The facility has occupied its current location, surrounded by single-family residences, a daycare center, and a high school, since 1974. Used transformers are received at the facility, drained of free oil, manually disassembled, and sorted for shipment to scrap dealers.

This environmental audit consisted of an on-site inspection of the facility, a review of pertinent records, and interviews with the owners, Mr. F. J. Doyle, Mr. Garry Doyle and Mr. Bob Kaylor, to evaluate the company's environmental compliance history. The audit revealed the following issues:

- EPA records indicate the company has a history of non-compliance with the Toxic Substances Control Act (TSCA), including monetary penalties and off-site soil contamination. The site has been referred to the EPA Region VI Superfund Section for action.
- The facility is located in a residential area and is adjacent to a children's daycare facility and a high school.
- The facility has not maintained operating and monitoring records for the heat cleaning oven, as required by their air permit.
- The facility does not have a Storm Water Pollution Prevention Plan (SWPPP).
- The facility does not have a Spill Prevention Control and Countermeasure Plan (SPCC).

2. PURPOSE AND SCOPE OF SERVICES

The purpose of the environmental audit was to assess environmental programs, practices, and site conditions at Doyle & Sons, and determine the relative risk or liability to CSW companies utilizing Doyle & Sons.

The Scope of Services for this environmental vendor audit is summarized as follows:

- Conduct a site inspection to observe facility operations and conditions.
- Review pertinent environmental records in relation to applicable federal and/or state regulations.
- Obtain financial assurance, liability insurance, or other financial records for review.
- Review current and historical compliance with environmental regulations.
- Prepare a vendor environmental audit report summarizing findings.

Prior to the on-site visit, Doyle & Sons was asked to complete relevant sections of the CSW Facility Vendor Audit Questionnaire. A copy of the questionnaire is included in Appendix A.

3. FACILITY DESCRIPTION

3.1 General Description

Doyle & Sons is an electrical transformer salvage company located at 905 North Poplar Street in Leonard, Texas. The facility is located on approximately 0.5 acres on the southwest corner of the intersection of North Poplar and Cottonwood Streets. Properties adjacent to the facility include residential housing and vacant land to the north and west, residential housing and a children's daycare facility across an alley to the south, and the Leonard High School located east across North Poplar.

Mr. F. J. Doyle started the transformer salvage company at this location in 1974. Currently, the company is owned by Mr. F. J. Doyle, who functions as the company president, Garry Doyle, and Bob Kaylor. The company has no other employees.

Retired transformers are transported to the site using vehicles owned by Doyle & Sons and stored outdoors on gravel. Mr. F. J. Doyle indicated the facility has only accepted certified non-PCB transformers for the last several years. Indeed, records from a previous audit conducted by Southwestern Electric Company (SWEPCO) indicated Doyle and Sons was only accepting non-PCB transformers in 1989. Transformers are drained of free oil and disassembled, components are segregated by metal type, residue is burned off smaller scrap in a heat cleaning oven, and the scrap is sold to scrap dealers.

Copies of the topographic map and facility site map are included in Appendices B and C, respectively. Facility photographs are included in Appendix D.

3.2 Aboveground Storage Tanks

The facility has three aboveground storage tanks (AST) in-service for storing used transformer oil. These tanks are located on the southwest corner of the site in secondary containment. Two tanks are 500-gallon capacity and the third is 275-gallon capacity. No underground storage tanks are located at the facility.

4. ENVIRONMENTAL COMPLIANCE HISTORY

Information about Doyle & Sons current and historical environmental compliance was obtained from review of company and EPA records and interviews with facility management. In addition, audits previously conducted by CSW personnel in 1989, 1991, and 1993 were reviewed. The following sections give a brief description of the company's compliance with major environmental regulations.

4.1 Clean Air Act

The facility was issued an air permit by the Texas Natural Resource Conservation Commission (TNRCC) on August 10, 1988, to operate a heat cleaning oven. The permit requires the facility to maintain operating and monitoring records. These records have not been maintained.

4.2 Clean Water Act

4.2.1 Storm Water Pollution Prevention Plan

As a salvage company, the facility is subject to the storm water regulatory requirements of the National Pollutant Discharge Elimination System (NPDES) permitting program, in accordance with the Clean Water Act. Under the storm water regulations, the facility is required to prepare and implement an SWPPP plan. A plan has not been prepared.

4.2.2 Spill Prevention Control and Countermeasure Plan

In addition to the used transformer oil storage tanks identified in Section 3.2, the facility stores several empty drums within the secondary containment. These drums are used when the storage tanks are full. As a result, the facility has sufficient oil storage capacity to be subject to the SPCC requirements at 40 CFR 112. The facility has not prepared and implemented a plan.

As a side note, Mr. Doyle stated EPA has inspected the facility regarding its compliance with 40 CFR 112. He mentioned the agency stated an SPCC plan was not required for the facility; however, no supporting documentation was offered to support his claim.

4.3 Resource Conservation and Recovery Act

The facility submitted a Notice of Registration to EPA in November 1993, and was assigned EPA ID Number TXD980865109. Minimal hazardous waste appeared to be generated and the facility would likely qualify as a conditionally exempt small quantity generator. See Appendix F.

Used oil drained from transformer cases is shipped to John Scoggins Company two to three times per year. Inspection of the used oil tanks showed they were not properly labeled, as required.

4.4 Toxic Substances Control Act

Review of EPA Region VI Toxics Enforcement Section records show EPA and their Technical Assistance Team (TAT) contractors have visited the facility several times since 1983 to conduct inspections, perform on-site and off-site sampling, and discuss non-

compliance issues. A brief summary of key events is listed below. Supporting documentation is contained in Appendix G.

- August 1983 – An EPA inspection showed tanks were not properly marked, records were inadequate, and an SPCC plan had not been prepared. These non-compliance issues resulted in a \$3000 fine, which the facility was unable to pay. A Consent Order was reached and the fine was reduced to \$50. (Appendix G-1).
- September 1990 through April 1991 – Sampling of the transformer oil storage tanks showed the contents contained greater than 50 ppm PCB. Several soil sampling events conducted by the EPA TAT showed PCB contamination in the storage yard and up to 280 ppm PCBs in the drainage ditch southeast of the property. (Appendix G-2).
- February 1995 – EPA transmitted a notice of violation to F. J. Doyle regarding on-site and off-site contamination. F. J. Doyle contracted Worldwide Reclamation, Inc. (WRI), to collect soil samples for analysis. No PCBs were found. (Appendix G-3).
- May 1995 - WRI collected additional soil samples. Analysis showed the PCB concentrations ranged from 1.45 ppm to 1590 ppm. The highest concentrations were located on the southeast corner of the property. (Appendix G-4).
- June 1995 – EPA's Toxics Enforcement Section referred the file to the Superfund Section. (Appendix G-5).
- July 1995 – EPA TAT returned to the site and conducted extensive off-site soil sampling, including on the daycare facility located south of the site. The samples were collected from various soil depths. The highest concentrations of PCBs, up to 852 ppm, were found in the alley, immediately south of the site. Samples taken from the yard of the daycare facility did not indicate the presence of PCBs. Lower PCB concentrations were found in various locations around the outside of the facility. (Appendix G-6).

During the interview with Mr. Doyle, he indicated the facility used to accept PCB-containing transformers for scrapping in the 1970's. It wasn't clear from the discussion how the PCB-containing oil was disposed of. Regardless, Mr. Doyle mentioned he gave many neighbors some of the oil for use as a weed killer at their homes.

In regard to the PCB-containing transformer oil storage tanks described previously in Section 3.2, EPA and facility records do not indicate the tanks were ever decontaminated. Apparently, these are the same tanks described in Section 4.3, in which the facility is currently storing used oil prior to shipment to John Scoggins Company for recycling.

EPA Interviews

Discussions with Dennis Falk of EPA's Toxics Enforcement Section on September 9, 1998, indicated the facility was assigned a Superfund ID number, and discussions with Doyle & Sons regarding site clean-up would resume soon.

Discussions with Jennifer Gibbs of the Toxics Enforcement Section on March 17, 1999, indicated the file has again been referred to the Superfund Section for action. A site inspection plan is being prepared. In addition, Ms. Gibbs mentioned the TNRCC conducted sampling at the site on October 23, 1998 at the request of the Texas Department of Health (TDH). TDH is conducting a health exposure assessment of the site at this time.

5. SITE INSPECTION

A site inspection of the facility was performed to observe existing operations and environmental conditions. Site observations of November 24, 1997, are summarized as follows:

- A children's daycare facility, residential housing and a high school are located immediately adjacent to the boundaries of the facility.
- Inspection of transformer disassembly areas indicated poor housekeeping practices, as evidenced by many oil stains on the floor and the use of makeshift containers to catch oil drained from transformers.
- The outdoor storage areas are somewhat organized.

6. FINANCIAL INFORMATION

Mr. Doyle allowed the company's financial records to be reviewed during the site visit, but would not allow them to be copied. The records showed very limited funds, and assets of the company included Mr. F. J. Doyle's residence and several old rental houses.

7. CONCLUSIONS

A review of previous audits conducted by CSW, a review of company and EPA records, and discussions with the management of Doyle & Sons raise the following issues:

- EPA records indicate the company has a history of non-compliance with regard to TSCA, including monetary penalties and off-site soil contamination. The site has been referred to the EPA Region VI Superfund Section for action.
- The facility is located in a residential area, and is adjacent to a children's daycare facility and a high school.
- The facility has not maintained operating and monitoring records for the heat cleaning oven, as required by their air permit.*
- The facility does not have an SWPPP.*
- The facility does not have an SPCC plan.*

In summary, Doyle & Sons has a history of non-compliance with TSCA regulations, which has contributed to significant on-site and off-site soil contamination. In addition, discussions with management indicate they do not have adequate knowledge of applicable environmental regulations.

Findings marked with * indicate these were current as of the date of the site visit in November 1997.

Doyle & Sons Transformer
Leonard, Texas

Vendor Environmental Audit Report
April 1999
Central and South West Services, Inc.

8. LIMITATIONS

This vendor audit has been carried out with diligence and detail consistent with standards and engineering practices prevailing at the time of the report. The scope of this investigation is limited to observations made during an on-site inspection, interviews with facility management, and review of information provided by Doyle & Sons, and discovered during the performance of this assessment.

It is not possible to predict events which may occur after the site visit and result in facility non-compliance with existing or new environmental regulations. There is no limited investigation thorough enough to absolutely identify the presence of all issues of environmental concern at a site. Conclusions should not be construed as a guaranteed absence or presence of such issues, but merely results of the investigation.

APPENDIX A

FACILITY QUESTIONNAIRE



Environmental Services

Facility Questionnaire

Facility Questionnaire

Introduction

We appreciate your cooperation in completing this questionnaire. If you handwrite your responses, please be as legible as possible. If you have already prepared summaries or other documents that answer some of the questions, you can attach them to this form (but please indicate after the question that you have done so and reference the attachment and page number in which the information can be found). Where we ask for quantities or distances, best estimates are acceptable.

Improving this questionnaire is an on-going effort. If you have any recommendations for information that should be added or deleted (or questions rephrased), please give us your comments at the end of the section. Thank you for your cooperation.

Name of person(s) completing this form:

Garry E. F.S. Doyle
Boo Kallor

Title:

Owners

Telephone: 903 545-0420

Date: November 17, 1995

I. General Information

A. Facility name, mailing address, and telephone number:

Doyle & Sons Transformers (903) 587-9420
905 NORTH POPULAR
LEONARD TOWN 75452

B. Location/address (if different):

SAME

C. Principal contact(s), title(s), and telephone number(s):

JERRY DOYLE - OWNER - (903) 587-9420

BILL DOYLE - OWNER - (903) 587-9420
F.S. DOYLE - OWNER - (903) 587-9420

(b) (6)

D. Type of facility (check all applicable):

- | | |
|---|---|
| 1. <input type="checkbox"/> Co-disposal landfill | 7. <input type="checkbox"/> Detoxification/chemical treatment |
| 2. <input type="checkbox"/> Secure landfill | 8. <input checked="" type="checkbox"/> Solvent recovery/recycle |
| 3. <input type="checkbox"/> Aqueous treatment | 9. <input type="checkbox"/> Broker/transshipment/bulk storage |
| 4. <input checked="" type="checkbox"/> Incineration | 10. <input checked="" type="checkbox"/> Oil recovery/recycle |
| 5. <input type="checkbox"/> Biological treatment | 11. <input type="checkbox"/> Accept PCBs >50 ppm |
| 6. <input type="checkbox"/> Solar evaporation | 12. <input type="checkbox"/> Other (describe) |

E. List the owners of the facility and their mailing addresses:

SAME

F. If the facility is a subsidiary, what is the name, address, principal contact(s), and telephone number(s) of the parent corporation/organization?

N/A

G. List the facility's (and parent company's) four digit Standard Industrial Classification (SIC) Code(s) with description(s):

N/A

H. Do you have any areas where you restrict access to site inspectors? If so, what are they and why? NONE

II. Financial

A. Which form of management does the firm operate under:

☐ Municipality
☐ Proprietorship
☐ Corporation

☐ Limited Partnership
☒ Other Partnership
☐ Other

B. What is the firm's Dun & Bradstreet number?

Parent N/A Facility _____
Please attach the D&B report(s).

C. If management is partnership, list the names and addresses of all partners, both general and limited.

GARRY DOYLE

(b) (6)

BOB ROJOF

(b) (6)

F.J. Doyle
PO Box 312
Lodi, CA 95240

D. Attach annual report with certified financial statements.

FIRST YEAR END WILL BE 12/31/97

E. Attach SEC Form 10K (only applicable in a publicly owned corporation).

N/A

F. Attach a copy of the following (if applicable):

- 1. The documentation submitted to the EPA Regional Administrator (RS) or the State as evidence of satisfying the EPA financial assurance mechanism for liability insurance and closure (and post-closure, if applicable) of facilities who are regulated under RCRA;
- 2. A letter sent to the RA or the State signed by the chief financial officer that includes required data from the independently audited, year-end financial statement; FIRST YEAR END WILL BE 12/31/97
- 3. An independent CPA's report on examination of the financial statements for the last completed fiscal year; and
FIRST YEAR END WILL BE 12/31/97
- 4. A special report from the owner's or operator's independent CPA to the owner or operator stating that: 1) the accountant has compared the data with the letter from the chief financial officer specified as having been derived from the independently audited, year-end financial statements for the latest fiscal year with the amounts in such financial statements, and 2) no matters came to his attention which caused him to believe that the specified data should be adjusted.
FIRST YEAR END WILL BE 12/31/97

G. Attach a copy of the company's standard waste disposal contract.

NOT APPLICABLE

H. What is the firm's policy on indemnification by the parent corporation for acts of individual sites/subsidiaries?

N/A

I. What is the firm's current bond rating (only applicable in publicly-owned corporation)?

N/A

Standard & Poor's: _____ Moody's: _____

J. Does the site have general liability and/or environmental impairment insurance? Please complete below as applicable for both policies and provide certificates of insurance.

	CARRIER	LIMITS (e.g., \$3 million per occurrence and \$6 million annual aggregate)
General Liability		
Environmental Impairment		

If any claim has been made against either of the above policies, please attach an explanation of the occurrence.

K. Have any insurance policies been terminated, canceled or refused renewal by any of the insurance carriers? ☐ Yes ☒ No

Please explain:

L. Did any insurance carrier have an independent engineering/risk assessment audit performed before issuing any of the policies listed above? ☐ Yes ☐ No

UNKNOWN TO ME.

If yes, please provide a copy of this report.

III. Administrative

- A. Please describe the facility's management chain-of-command or attach an organization chart.

NOT Applicable

- B. Please describe the background/experience/training of the facility's management. Include at a minimum the facility's general manager, sales director, technical director and laboratory director. If available, attaching résumés is sufficient.

ALL PARTNERS HAVE WORKED IN THIS TYPE
BUSINESS FOR MANY YEARS.

- C. How many employees are there and what is the breakdown by department?

2 - OFFICE DO IT ALL

- D. For the past three (3) years, please provide the total number of full-time and part-time (each) employees at the start of each year by major department (e.g., sales, lab, technical, and office). Any consistent accounting year is satisfactory.

2 - OFFICE ONLY

- E. What is the annual employee turnover rate for the past three years?

NOT Applicable

F. Please provide the names and telephone numbers of the person(s) responsible for each of the following:

1. General Manager:
2. Technical Operations:
3. Sales/Marketing:
4. Laboratory/Quality Control:
5. Permits/Regulatory Compliance:
 - a. Environmental:
 - b. DOT:
 - c. OSHA:
6. Security:
7. Emergency Response:
8. Personnel Training:

GARRY DOYLE, PARTNER
BOB KAYLOR, PARTNER
F.S. LYLE, PARTNER

IV. Regulatory

A. Does your facility have an EPA RCRA ID Number? If so, please list below.

?

B. Please attach copies of applicable permits from federal, state, or municipal authorities governing discharge into water or air, and treatment, storage, and disposal, or transport of wastes.

Please send a copy of the RCRA Part A permit application and a copy of the General Facility Description section from the Part B application, if applicable.

- C. Provide names and telephone numbers of the environmental regulatory officials, from each of the permit agencies above, with whom the facility's management deal. Include both an enforcement/inspection and a permit writer/reviewer from each agency, as applicable.

?

- D. Has the facility or any of its employees been charged with non-compliance of any permit or had any fine or penalty imposed within the last three (3) years? If so, please explain. Attach copies, or state whether copies will be made available, of any notices relating to any past or present violations, fines, or pending or alleged non-compliance activities.

NONE

- E. Have there been any allegations of violations made against the facility or its employees? If so, attach copies of allegations or explain below.

NONE

F. Provide a summary of all past (last ten (10) years), current or pending environmental litigation involving the facility, its employees or its parent organization. In preparing this summary, please answer the following:

THIS IS A FIRST YEAR ENDING 12/31/97

G. Are there any previous, current or pending lawsuits against the firm alleging its responsibility for environmental damage to persons, property, or natural resources?
☐ Yes ☒ No If yes, what are the known details litigation?

H. Are there any past, current or pending regulatory actions by federal, state, or local environmental officials that allege the firm's non-compliance with existing environmental regulations, or would require the firm to monitor and/or clean up an existing or ongoing contamination problem? ☐ Yes ☒ No If yes, what are the known details?

I. Are there any existing on-site or off-site contamination problems (of air, soils, surface or ground water) related to the corporation's activities of which the firm is currently aware, or is in the process of investigating? ☐ Yes ☒ No If yes, what are the known details?

J. Have any officers or directors of the facility or its parent corporation been convicted of any state or federal securities violations? ☐ Yes ☒ No If yes, explain:

N/A

V. Community Relations

A. What is the name of the newspaper(s) that generally cover the facility?

THE LEONARD GRAPHIC

B. Please provide five (5) references (name, affiliation, telephone) familiar with the operation of your facility, at least three (3) of which are waste generators who use the facility.

1.

2.

3.

4.

5.

C. Please identify at least two (2) of the local emergency response teams (e.g., fire, police, hospital) with the name and telephone of a contact at that organization.

1. Leonards Police Department - P.E. Dyer - Chief - 903 587-2634

2. Leonards Fire Department - Staff Baker - Chief - 903 587-2221

D. Please identify at least three (3) local officials (elected or appointed), preferably one with general authority (e.g., mayor, selectman, town council members, etc.) and one or more with specific regulatory responsibilities (e.g., zoning board or wetlands commission member, health officer, etc.). Include telephone numbers.

1. Staff Baker - Mayor - 903 587-2221

2. Lloyd Fianagan - Fannin County Commissioner - 903 527-3631

3. Darwin Nolen - Council member - 903 587-2245

VI. Facility Description

A. General

1. Location: (If available, please attach a USGS map and show site boundaries.)

Corner of Cottonwood & Poplar, Leonard, Texas

2. Size:

a) Total acreage .2

b) Acreage dedicated to waste treatment/disposal: _____

c) Acreage vacant but available for waste treatment/disposal _____

3. What are the hours of operation?

6:00 a.m. to 3 p.m.

Monday - Thursday

4. Describe former activities on-site (if any):

N/A

5. Method of waste delivery: (e.g. rail, truck, etc.)

Truck

6. What wastes are specifically not handled by this facility, although they may not be excluded under the permit to operate?

We do not handle

Over 30 parts per million PCB

7. How is site access controlled? (e.g., describe receiving procedures security fences/barriers, identification of persons entering, etc.)

6 ft. wood fence surrounds area

8. What is the projected site life?

?

9. What wastes are received for treatment/disposal? (Complete Table I)

Table I
General Types of Materials Received

Waste Type	Drums or Containers	Liquid	Sludge	Solids	Major Customer (if any)
Domestic Solid Waste					
Flammable/Combustible					
Heavy Metals	X				SWEF 30
Biocides					
Acids					
Bases					
Biological					
Oxidizers					
Water Reactives					
Air Reactives					
Persistent Organics					
Infectious					
Asbestos					
Heavy Oil					
PCB's					
Other (explain)					

Place "X" in Appropriate Boxes

Table II
Aboveground Tank Storage Information

Tank ID	Capacity (gal)	Contents	Material of Construction	Spill Containment			
				Type	Volume	Liner Material	Age
	6	TRANSFERRING OIL	STEEL METAL				
	500	TRANSFERRING OIL	STEEL METAL				
	275- 300	TRANSFERRING OIL	STEEL METAL				

B. Waste Storage

1. Aboveground Tanks

a) Complete Table II regarding number, size, contents, material, design, etc., of tanks. Attach copy of SPCC plan.

b) Describe distribution system from receiving point(s) to tanks.

Pump oil from inside of shop above ground to indoor tanks

i) Is piping underground? If yes, what percentage of piping is underground?

ii) Is it tested? ☐ Yes ☐ No If yes, what is the frequency of testing?

c) Describe distribution system from tanks to ultimate disposal or treatment.

pumped from our tanks into a
treatment tank

i) Is piping underground? If yes, what percentage of piping is underground?

NO

ii) Is it tested? ☐ Yes ☐ No If yes, what is the frequency of testing?

iii) Fail safe interlocks? ☐ Yes ☒ No

iv) Waste feed shut-off? ☐ Yes ☒ No

d) Are tanks vented through scrubbers or vapor recovery systems? Explain.

NO

e) What is the ultimate destination of the rain water runoff in the outdoor tank area?

CURBED

2. Underground Tanks

a) Complete Table III regarding number, size, material, age, design, etc., of tanks.

b) Identify secondary containment where appropriate.

N/A

c) Is tank integrity tested? ☐ Yes ☒ No If yes, what is the frequency of testing?

d) Describe distribution system from receiving point(s) to tanks.

i) Is piping underground? If yes, what percentage of piping is underground?

ii) Is it tested? ☐ Yes ☐ No If yes, what is the frequency of testing?

iii) Fail safe interlocks? ☐ Yes ☐ No

e) Describe distribution system from tanks to ultimate disposal or treatment.

i) Is piping underground? If yes, what percentage of piping is underground?

ii) Is it tested? ☐ Yes ☐ No If yes, what is the frequency of testing?

iii) Fail safe interlocks? ☐ Yes ☐ No

f) Are tanks vented through scrubbers or vapor recovery systems? Explain.

3. Container/Drum Storage (include portable tanks)

a) Maximum area dedicated to container/drum storage:

INSIDE SHOP 312 10FT. by 10FT. area in
CONCRETE DIKE

b) Design of container/drum storage area:

Covered? NO

Impermeable base? CONCRETE

Diked? CONCRETE

Segregated areas for incompatible materials? _____

c) Estimated current number of container/drums in storage on-site:

10

d) Are there warehousing or staging areas off-site? If so, what is the address?

NO

i) What percentage of overall container/drum storage is at this site?

100%

ii) Site permit or EPA ID Number for storage:

iii) Are any of the containers/drums stored for more than ninety days? If yes, what percentage of the containers/drums are stored for longer than ninety days?

NO

5. Lagoons or Impoundments

a) How is ground water monitored in vicinity of the lagoon/impoundment?

Not applicable

b) Complete Table IV regarding number, size, contents, design, etc., of lagoons/impoundments.

Table III
Underground Tank Storage Information

Tank ID	Capacity (gal)	Contents	Material	Corrosion Protection		
				Coating	Cathodic System	Age

6. Waste Storage Piles (for each):

- a) Number _____
- b) Contents _____
- c) Volume _____
- d) Base material type _____ Thickness _____
Permeability _____
- e) Runoff control system _____

7. Landfills (for each):

- a) Area of active landfill _____
Available capacity _____
- b) Area of proposed landfill _____
- c) Area of closed landfills _____
- d) Waste types and quantity _____
Active: _____
Past: _____
- e) Are materials fixed or stabilized before landfilling? _____
Describe materials and process: _____
- f) Liner specifications (each): _____
- g) Leachate detection and collection systems (each): _____
- h) How do you dispose of leachate? _____

i) Thickness and type of cover material (intermediate and final):

j) Is there ground water monitoring around the perimeter of the landfill?
Describe.

k) Are on-site disposal contracts carried out under long-term contract or on a lot-by-lot basis? Describe arrangements:

8. Surface Water Control

For each storage area and type, describe run-off/run-on control and methods of testing and treating collected liquids:

Table IV
Lagoon/Impoundment Information

Lagoon/ Impoundment ID	Rated Capacity (gal)	Contents	Primary Liner		Secondary Liner		Methods of Leachate Detection	Methods of Leachate Collection	Is Ground Water Monitored Y or N
			Material	Thickness	Material	Thickness			

C. Waste Treatment

1. What is the facility's main waste treatment process?

2. Does the facility have the following capabilities?

PROCESS	TYPE	CAPACITY
Oil Recycling	Non PCB Transformer Oil	1300 22 bbls
Solvent Reclamation		
Oil/Water Separation		
Acid/Base Neutralization		
Sludge Dewatering		
Sludge Stabilization		

3. For each process, what is done with the following?

Recoverable products?

SELF-COMPOSTED C.M.F.

Liquid residuals?

Sludges or solid residuals?

4. What is the average length of time between waste receipt and processing?

D. Waste Destruction

1. Incineration

a) Type _____

- b) Capacity_____
- c) Materials Handled_____
- d) Destruction Efficiency_____
- e) Scrubber Efficiency_____
- f) Emission Rates_____
- g) Waste Feed Limits (set by RCRA permits)_____
- h) Has dispersion modeling been conducted for the point source?_____
- i) Fate of scrubber sludge or solid residuals_____
- j) Fate of incineration solid residuals_____

2. Other Destruction Capacity

Describe process capacity and fate of residuals.

E. Waste Bulking and Transshipment (repackaging for shipment)

1. Are wastes collected at the site for treatment elsewhere? ☐ Yes ☒ No
If yes, describe type of wastes and any bulking process:

2. Is off-site treatment carried out on a long-term contract or lot-by-lot basis?

NC

3. Identify off-site treatment facilities by waste type.

F. Electric Equipment Rebuilding and Salvaging

— 1. What is the disposal procedure for waste oil? Include data about the disposal site.

2. How is waste oil stored while on-site? (tanks, drums, etc.)

3. What is the disposal procedure for scrap metal? Include data about the disposal site.

Scrap metal is put into self-controlled oven.
The paper residue is burnt off.

Picked up by EPA - Recycling

— 4. Is oil from rebuilding or salvaging activities reused, processed, or burned for energy recovery? If yes, please explain fully.

— 5. What are the special handling procedures (if any) for the used oil?

6. Is the facility a transporter of used oil? If applicable, please attach EPA registration Form 8700-12.

NC

G. Polychlorinated biphenyls (PCB) Storage and Disposal

1. As applicable for PCB waste, is the facility-a
commercial storer? ☐ Yes ☒ No
transporter? ☐ Yes ☒ No
disposer? ☐ Yes ☒ No
generator? ☐ Yes ☒ No

If yes, please attach a copy of EPA Form 7710-53 Notification of PCB Waste Activity.

2. Does the facility have a PCB storage facility subject to the requirements of 40 CFR 761.65(b)? ☐ Yes ☒ No If yes, where are annual records maintained?

3. Are aboveground bulk tanks used for storage of PCB waste? ☐ Yes ☒ No

4. What means of on-site disposal is used for PCB waste materials?

Material	Method (landfilling, recycling, incineration, chemical detoxification, etc.)	Yearly Amount (in lbs., gallons, etc.) Material Processed
PCB-Contaminated mineral oil		
Other PCB- Contaminated liquids		
Non-liquid PCBs >49 ppm (soil, rags, debris)		
PCB Liquids		
PCB Transformers		
PCB Capacitors		
PCB Containers		

2. Describe any previous on-site processing or disposal practices different than those above:

3. How long has this site processed PCBs?
4. How are PCB waste materials transported to the facility? (truck, rail, etc.)
5. What is the average length of time between PCB waste receipt and disposal?
6. Are there any by-products (e.g., air emissions, residues, etc.) generated by the processing of PCB waste materials? If yes, indicate the engineering controls used to limit any exposure that may occur.
7. Please attach the site's federal, state, or local permit(s) which regulate the PCB activities of the facility.
8. Attach the transporter's federal, state, or local permit for transporting PCBs (if available).

VII. Employee Training (Job)

A. Initial Training

1. Upon first employment, what training is provided to the new employee?

NONE - FORMER OWNED

2. Please identify the instructor and his/her qualifications.

3. How is previous employee training verified?

4. What on-the-job training is provided and by whom?

5. How is employee comprehension of the training measured? (e.g., classroom testing, supervisor's report, etc.)

B. Employee Retraining and Updating

1. What additional training is provided to employees after initial training? (e.g., regulation updates, new safety equipment)

2. Please identify the instructor and his/her qualifications.

3. How is employee comprehension of the training measured? (e.g., classroom testing, supervisor's report, etc.)

C. Employee Training at a RCRA Regulated Site

1. What specialized training is provided to employees handling hazardous waste?

2. Please identify the instructor and his/her qualifications.

3. How is employee comprehension of the training measured?

5. What manner of respirator fit testing and training is provided for employees handling hazardous waste?

VIII. Site Characterization

A. Land Use

1. Property use and zoning (provide direction from facility):
2. Are crops grown on adjacent properties? ☐ Yes ☒ No
If yes, please describe.

3. Population within 1 mile? 1000
Direction to concentrations:

Population within 3 miles? 1500
Direction to concentrations:

4. Location of sensitive receptors (schools, hospitals, etc.)

Type:

Direction:

Distance:

5. Prevailing wind direction and speed:

B. Surface Water

1. Nearest River or Stream _____
Name: _____
Distance: _____
7 day 10 yr. low flow: _____
Water quality classification: _____

2. Drinking Water Source

Name: _____

Distance: _____

Population served: _____

Other downstream data _____

3. Nearest Reservoir/Lake

Name: _____

Distance: _____

Volume: _____

Water quality classification: _____

Use: _____

4. Flooding

Is any part of the facility located within the 100 year flood plain or a coastal high hazard zone? If yes, describe flood protection for active and inactive areas.

Has the site sustained any past flood damage? Describe.

5. Monitoring

Is surface water monitored at the facility? If yes, describe location and parameters used.

C. Ground Water

1. Depth to water table?

2. Depth to usable aquifer?

Name: _____

3. Distance to nearest down gradient high capacity well and its use?

4. Distance to the nearest low capacity well (domestic)?

5. Is site in an aquifer recharge zone? Identify.

6. Surficial material at site?

Type: _____ Thickness: _____

7. Impermeable layers - formation name: (for each)

Depth: _____ Material: _____

Thickness: _____

8. Aquifers - formation name: (for each)

Depth: _____ Material: _____

Thickness: _____ Usage: _____

9. Within 3 miles of the site has there been:

Extensive ground water use for a long period of time? ☐ Yes ☐ No

Oil or mineral borings? ☐ Yes ☐ No

10. Has ground water modeling been carried out for the site? ☐ Yes ☐ No

If yes, please describe.

11. Describe the general geohydrologic setting:

12. Ground water monitoring:

Number of wells:

Frequency of monitoring:

Parameters monitored:

IX. Source Information

A. Air

1. Identify potential sources of airborne emissions associated with the site:

Point sources: _____

Incinerators: _____

Scrubbers: _____

Vents: _____

Tank Vents: _____

2. Please attach data to identify and quantify control technology for each source.
3. Does the site have federal, state, or local air emission permits or licenses? If yes, please list all permits and licenses by source and include permit numbers and permissible emission guidelines.

Source	Permit or License #	Permissible Emissions

4. Does the site meet its permit emissions standards? If no, please identify the emission standard(s) not being met and indicate engineering controls (if any) being undertaken to control the contaminant(s).
5. Has air dispersion modeling been done for routine and emergency conditions? If yes, please provide report.

B. Water

1. Identify sources of waste water originating at the site, approximate volume, major chemical constituents or properties, and fate of each stream.

Source	Volume	Chemical Constituents or Properties	Fate of Stream

2. Identify the fate of each stream.

- a. Small volumes collected on drums or tanks for off-site treatment. Identify ultimate disposal.
- b. If waste water is conveyed by sewer to on-site or off-site treatment/disposal. Identify:
 - c. Ownership of sewer (municipal or client): _____
 - d. Age and construction material of sewer system: _____
 - e. Has integrity of sewer system been checked within last 3 years? If yes, when, how, and what were the results?
 - f. Does the site meet its effluent guideline? If no, please identify the effluent guideline(s) not being met and indicate engineering controls (if any) being undertaken to control the contaminant(s).

- g. Does the site have federal, state or local waste water discharge permits or licenses? If yes, please list all permits and licenses for each outfall and include permit numbers and effluent guidelines.

Outfall	Permit or License #	Effluent Guidelines

C. Laboratory

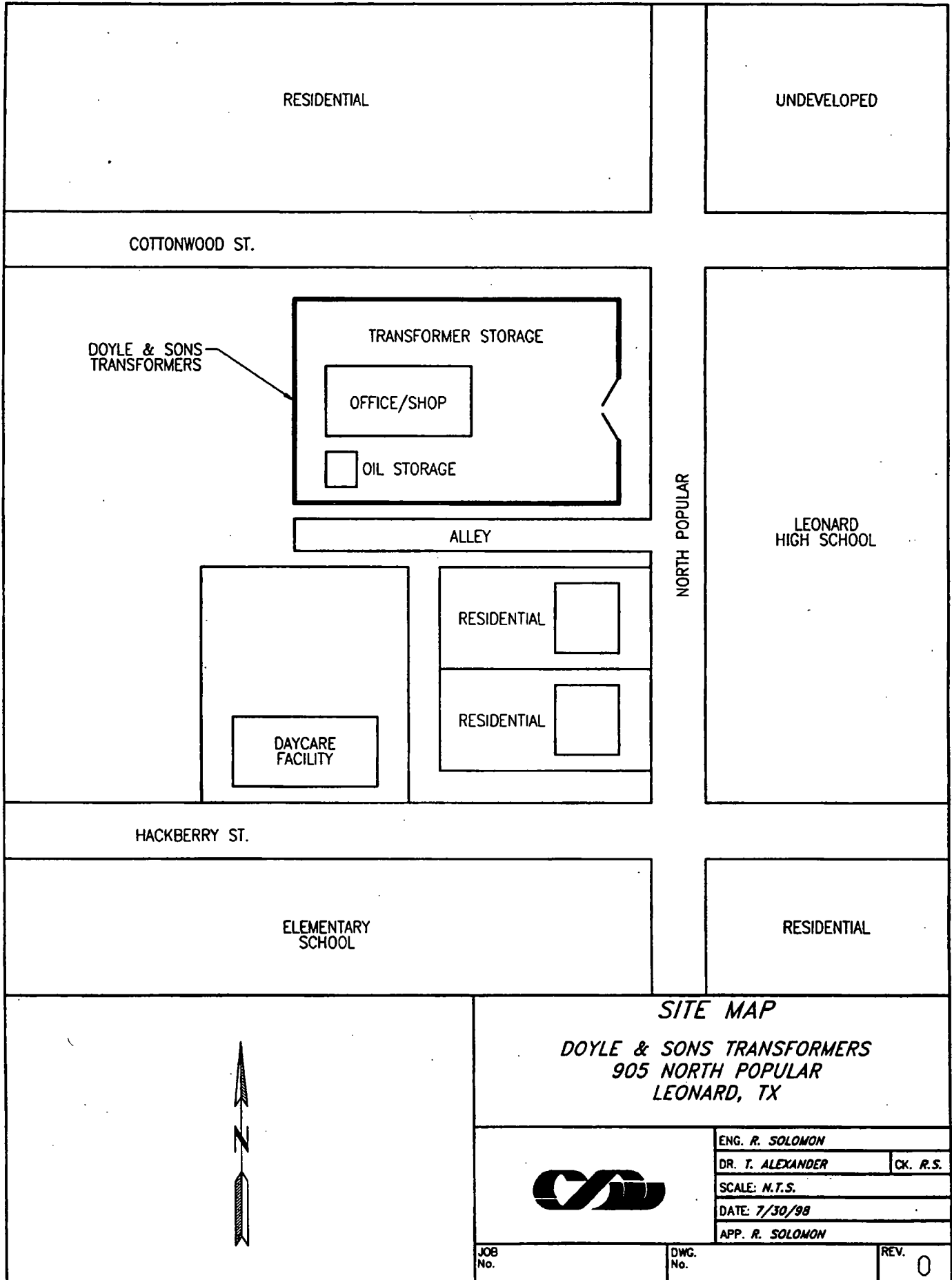
1. Are there on-site analytical capabilities? ☐ Yes ☐ No If yes, complete the next sections for that lab. If no, complete the next sections for the outside lab.
2. List major analytical equipment (e.g., G/C, A/A, etc.) and the types of analyses performed by the lab.
3. Qualifications of the lab director and chemists:
4. Describe chain of custody procedure and attach a copy of the form.
5. What laboratory does the analytical certification?

APPENDIX B

TOPOGRAPHIC MAP

APPENDIX

SITE MAP



SITE MAP

**DOYLE & SONS TRANSFORMERS
905 NORTH POPULAR
LEONARD, TX**



ENG. R. SOLOMON	
DR. T. ALEXANDER	CK. R.S.
SCALE: N.T.S.	
DATE: 7/30/98	
APP. R. SOLOMON	

JOB No.	DWG. No.	REV. 0
------------	-------------	-----------

APPENDIX
SEE PHOTOGRAPHS

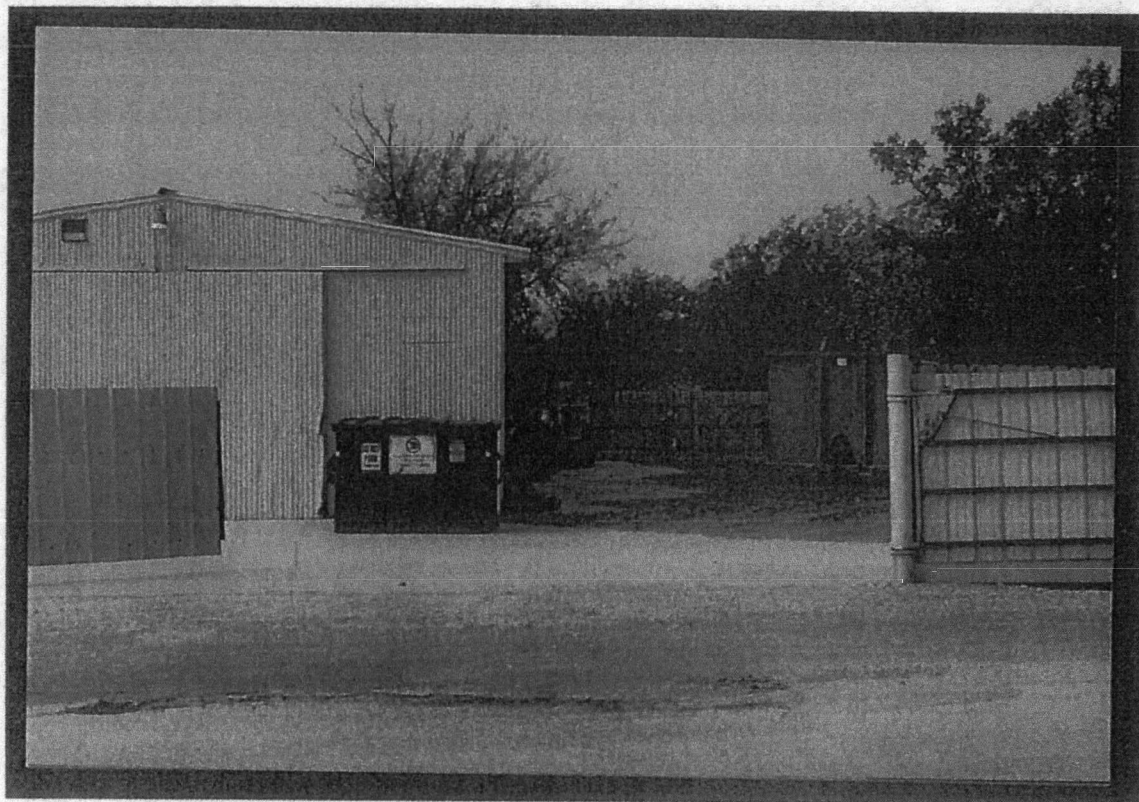


Photo No. 1: Photo shows the entrance and office/shop of Doyle & Sons Transformers. View is looking west.

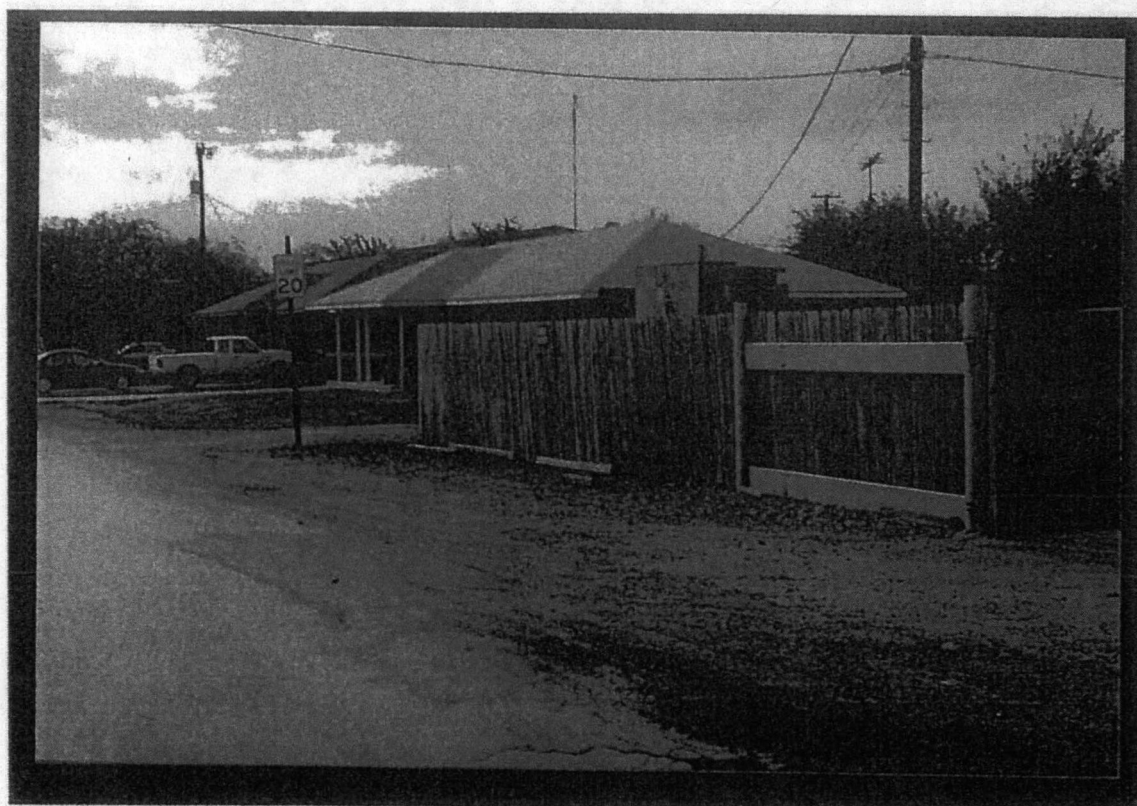


Photo No. 2: Photo shows the residences to the south of Doyle & Sons along North Popular.

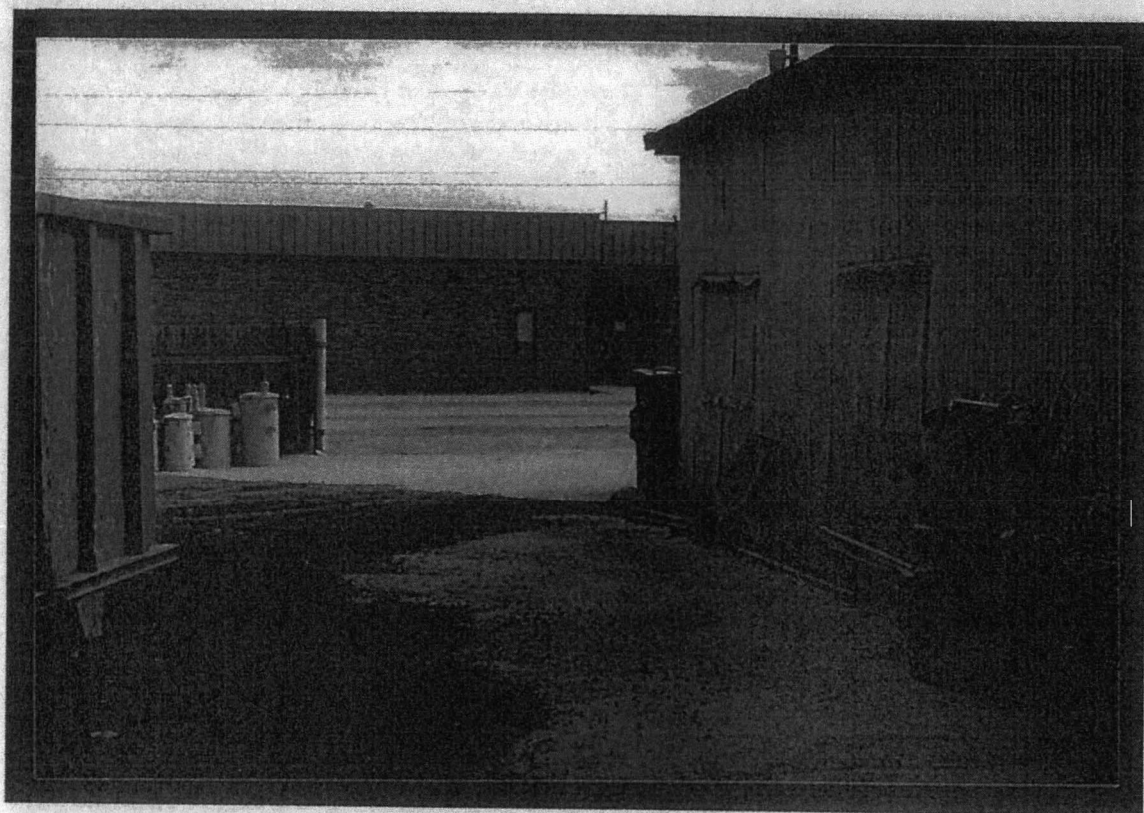


Photo No. 3: View shows a portion of the Leonard High School to the east across North Popular .

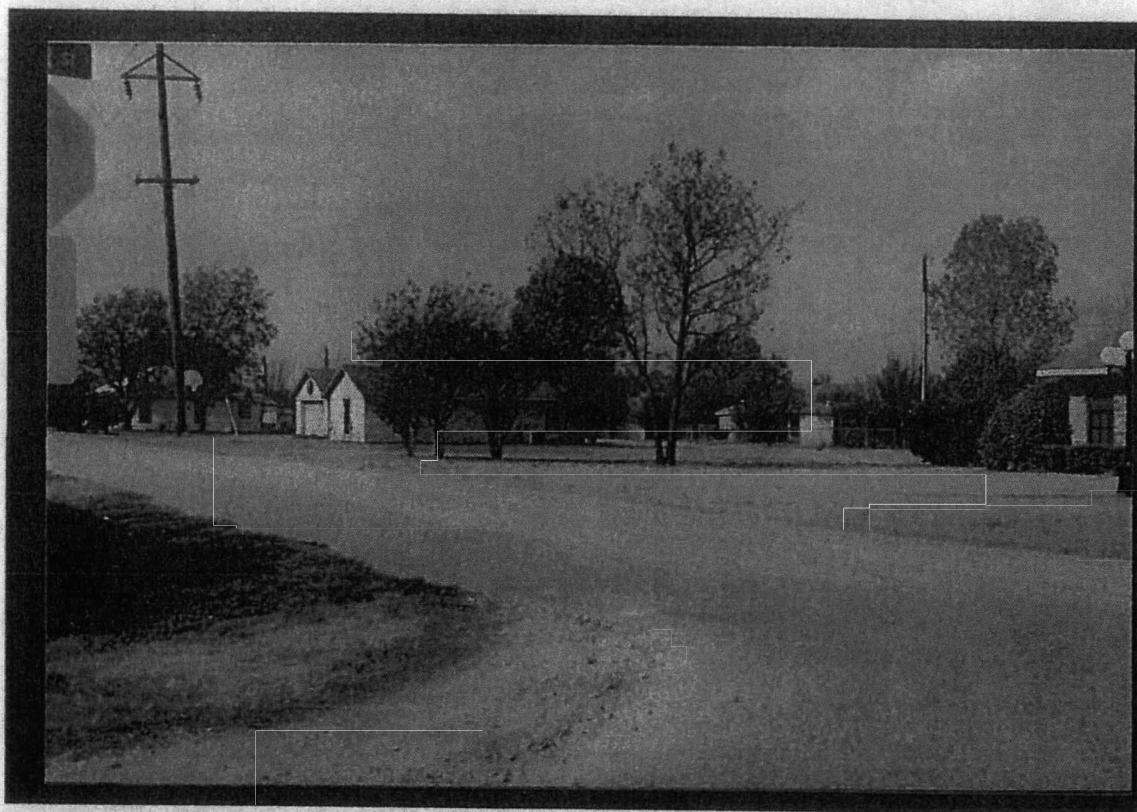


Photo No. 4: View of the residential area north and west of the site.

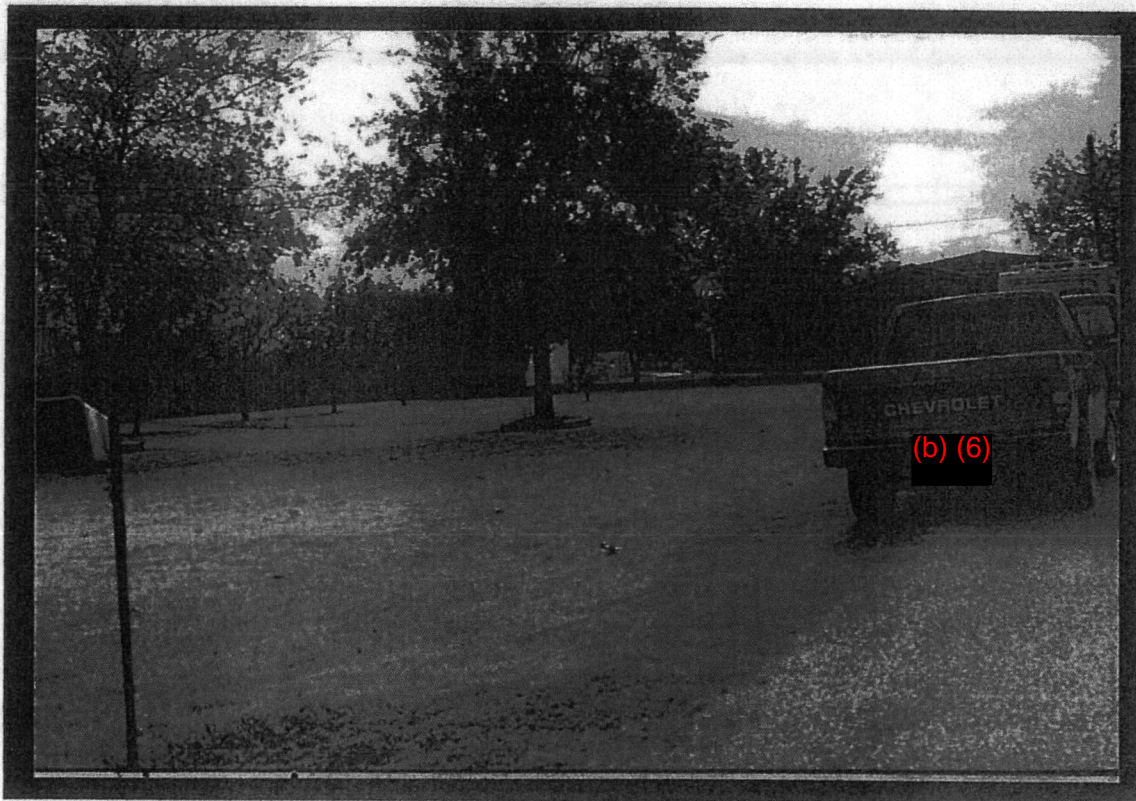


Photo No. 5: The fence on the left denotes the site's western boundary; looking south. Back of the daycare facility is visible in the center of photo.



Photo No. 6: View of the transformer storage area on the north side of the facility, looking west.

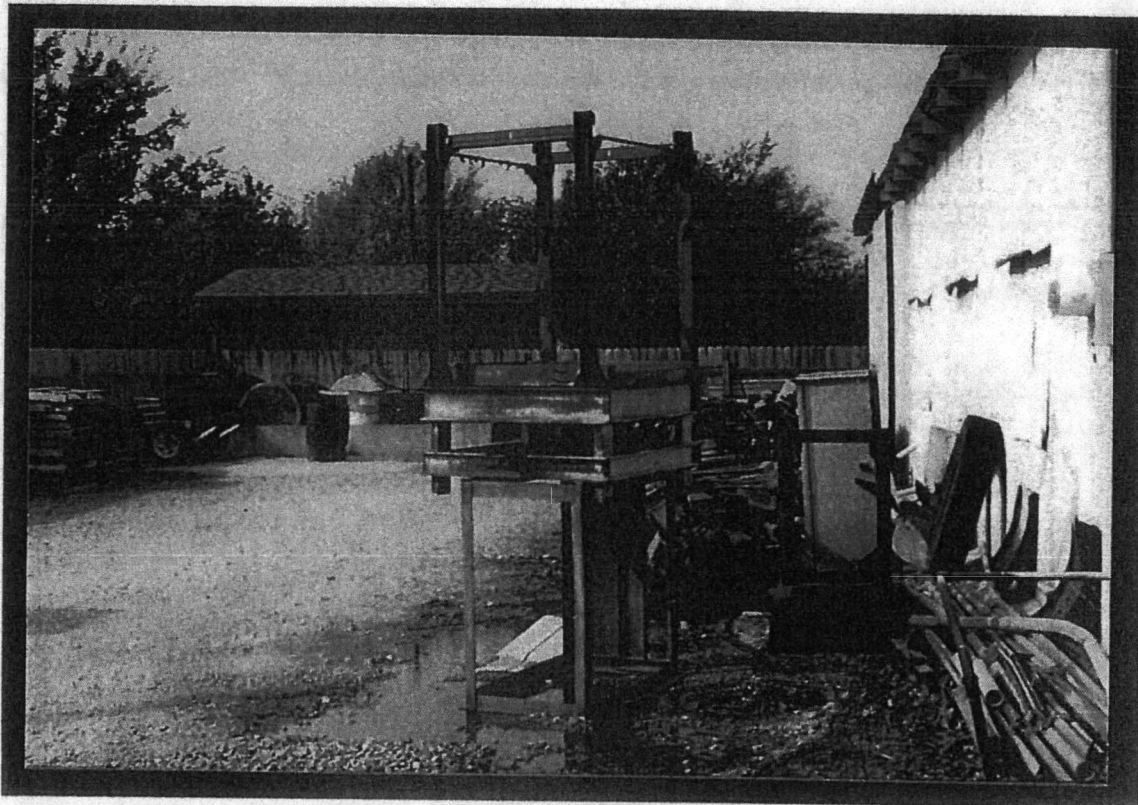


Photo No. 7: View of the miscellaneous items stored on the south side of the site, behind the shop. View is looking west.

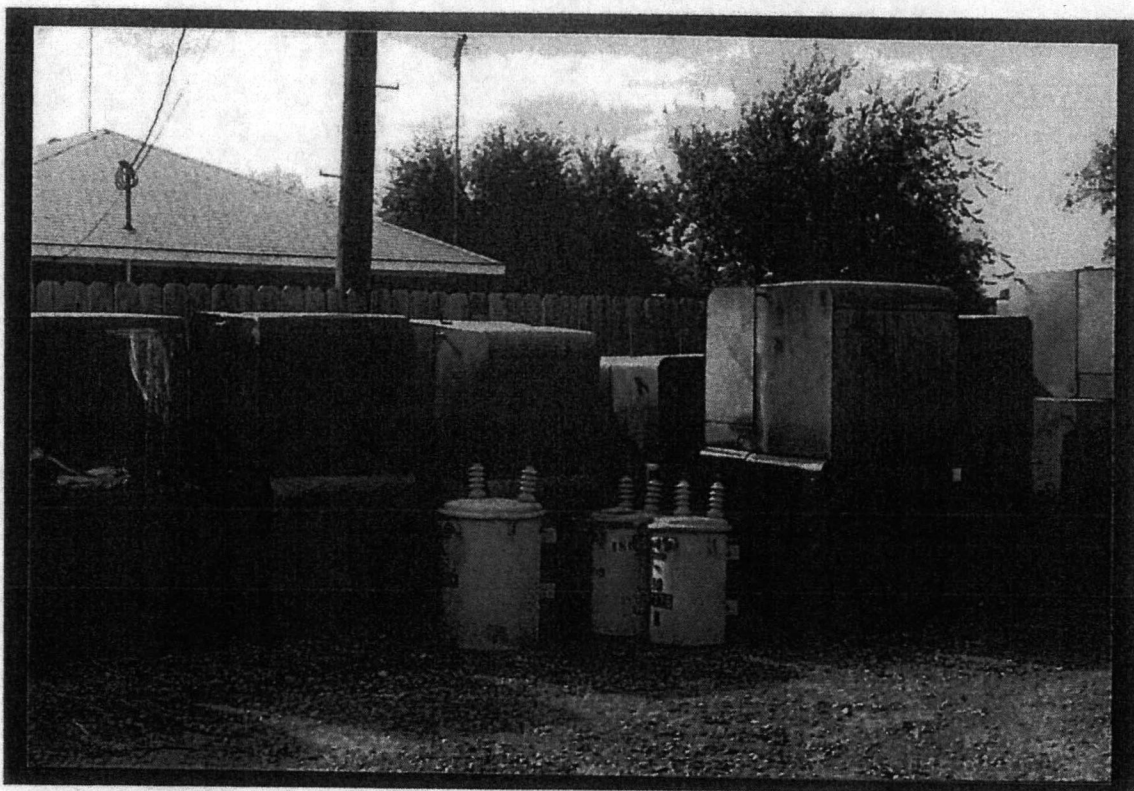


Photo No. 8: View of transformers stored against the fence on the south side of the site.

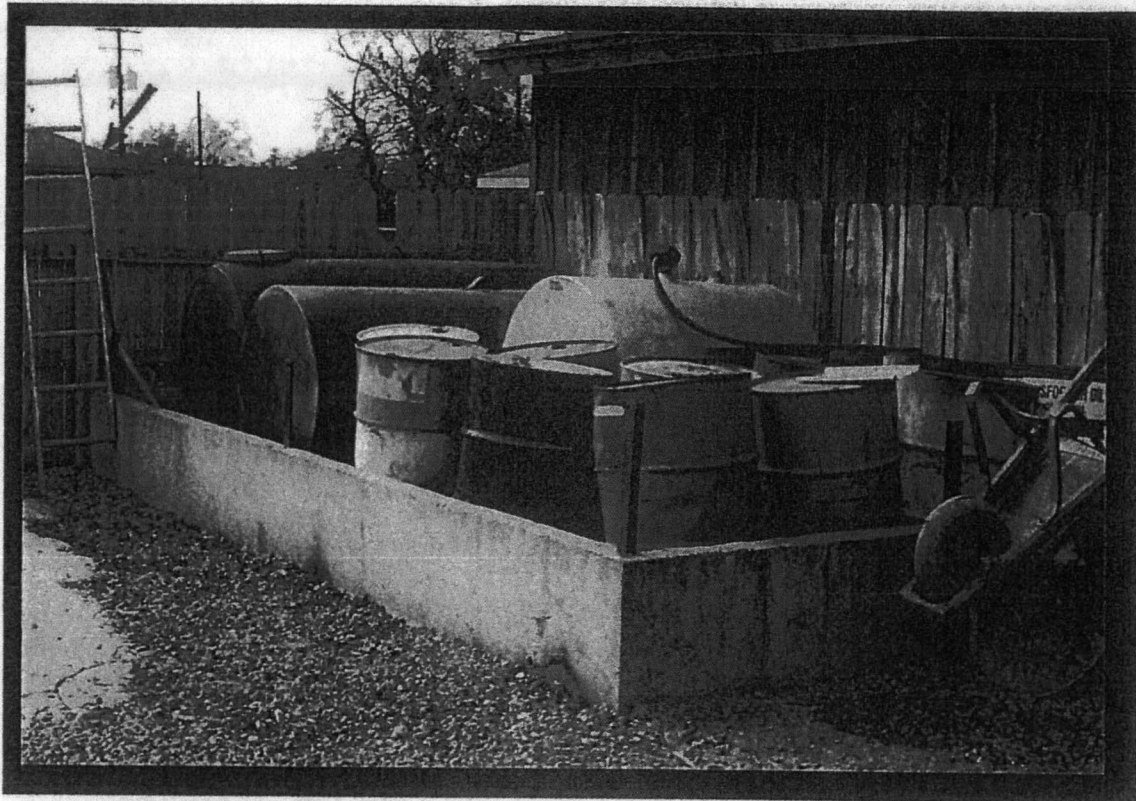


Photo No. 9: View of the oil storage area in the southwest corner of the facility. The arrow shows the roof of the daycare facility.



Photo No. 10: View shows the proximity of the daycare facility to Doyle & Sons.

TEXAS AIR CONTROL BOARD

6330 HWY. 290 EAST, AUSTIN, TEXAS 78723, 512/451-5711

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CHAIRMAN

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WILLIAM H. QUORTRUP
C. H. RIVERS
WARREN H. ROBERTS
MARY ANNE WYATT

6421 Camp Bowie Boulevard
Suite 312
Fort Worth, Texas 76116
Telephone: 817/732-5531

April 5, 1991

Mr. F. J. Doyle, Owner
F. J. DOYLE SCRAP METAL
Post Office Box 312
Leonard, Texas 75452

Re: Permit No. T-18612
Heat Cleaning Oven
Leonard, Fannin County
TACB Account No. FB-00002-X

Dear Mr. Doyle:

An operating permit for your facility is enclosed. We will appreciate your carefully reviewing the conditions of the permit and assuring that all requirements are consistently met.

Thank you for your cooperation in sending us the information necessary to evaluate your operations and for your commitment to air pollution control. Please let us know if you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Melvin V. Lewis".

Melvin V. Lewis
Regional Director
Region 8 - Fort Worth

Enclosure

cc: Technical Services Division, TACB, Austin

TEXAS AIR CONTROL BOARD

2033200

6330 HWY. 290 EAST
AUSTIN, TEXAS 78723
512/451-5711

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MARY ANNE WYATT

RECEIVED

AUG 15 1988

REGION 8
TEXAS AIR CONTROL BOARD

August 10, 1988

Mr. F. J. Doyle
F. J. DOYLE SCRAP METAL
Post Office Box 312
Leonard, Texas 75452

Re: Special Permit No. S-18612
Heat Cleaning Oven
Leonard, Fannin County

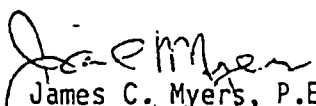
Dear Mr. Doyle:

A special permit for your new facility is enclosed. We appreciate your cooperation in sending us the information necessary to evaluate your proposal.

We have enclosed an application for a permit to operate (Form PI-3). Section 3.28(a) of the Texas Clean Air Act requires that you apply for such permit within sixty days after the facility has begun operation. Please complete and return the application.

Thank you for your cooperation and interest in air pollution control.

Sincerely,


James C. Myers, P.E.
Director, Enforcement Program

Enclosures

cc: Mr. Melvin Lewis, Regional Director, Fort Worth



TEXAS AIR CONTROL BOARD

A CONSTRUCTION PERMIT
IS HEREBY ISSUED TO

F. J. DOYLE SCRAP METAL

AUTHORIZING CONSTRUCTION OF

Heat Cleaning Oven

TO BE LOCATED AT

Leonard, Fannin County, Texas
Lat. 33°24'21" Long. 96°14'33"

and which is to be constructed in accordance with and subject to the Texas Clean Air Act, as amended (Article 4477-5, V.A.T.S.), and all Rules, Regulations and Orders of the Texas Air Control Board. Said construction is subject to any additional or amended Rules, Regulations and Orders of the Board adopted pursuant to the Act and to all of the following conditions:

1. This permit may not be transferred, assigned or conveyed by the holder and applies only to the location specified herein.
2. This permit is automatically void upon the occurrence of any of the following:
 - a. The issuance or denial of an operating permit.
 - b. Failure to begin construction within eighteen months of the date of issuance.
 - c. Discontinuance of construction for a period of eighteen consecutive months or more.
3. This permit becomes invalid if construction is not completed within a reasonable time.
4. The facility covered by this permit shall be constructed as specified in the application for permit to construct.
5. The Board shall be notified prior to the start-up of the facility authorized by this permit in such a manner that a representative of the Texas Air Control Board may be present at the time of start-up.
6. The Board shall be notified prior to the start of any required monitoring of the facility authorized by this permit in such a manner that a representative of the Texas Air Control Board may be present during monitoring.
7. This permit is not a guarantee that the facility will receive an operating permit at the end of the construction period, nor does it absolve the holder from the responsibility for the consequences of noncompliance with all Rules, Regulations and Orders of the Texas Air Control Board or with the intent of the Texas Clean Air Act.
8. Emissions from this facility must not cause or contribute to a condition of 'air pollution' as defined in Section 1.03 of the Texas Clean Air Act or violate Section 4.01 of the Texas Clean Air Act, Article 4477-5, V.A.T.S. If the Executive Director of the Texas Air Control Board determines that such a condition or violation occurs, the holder shall implement additional abatement measures as necessary to control or prevent the condition or violation.
9. Special Provisions: See attachments labeled "General Provisions S-18612," 1-5, and "Special Provisions S-18612," 1-11.

Acceptance of the permit constitutes an acknowledgement and agreement that the holder will comply with all Rules, Regulations and Orders of the Board issued in conformity with the Act and the conditions precedent to the granting of this permit. Failure to comply with all special provisions of this permit will subject the holder to the enforcement provisions of the Texas Clean Air Act, Article 4477-5, V.A.T.S.

PERMIT NO. S-18612 DATE 8/10/88

Handwritten signature of Eli Bell in cursive.

EXECUTIVE DIRECTOR
TEXAS AIR CONTROL BOARD

Handwritten signature of Steve Shaw in cursive.

Deputy Executive Director

000342

GENERAL PROVISIONS

S-18612

1. Equivalency of Methods - It shall be the responsibility of the holder of this permit to demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods and monitoring methods proposed as alternatives to methods indicated in the provisions of this permit. Alternative methods shall be applied for in writing and shall be reviewed and approved by the Executive Director prior to their use in fulfilling any requirements of this permit.
2. Sampling Requirements - If sampling of stacks or process vents is required, the holder of this permit must contact the Quality Assurance Division of the Texas Air Control Board prior to sampling to obtain the proper data forms and procedures. The holder of this permit is also responsible for providing sampling facilities and conducting the sampling operations at his own expense.
3. Appeal - This permit may be appealed pursuant to Rule 103.81 of the Procedural Rules of the Texas Air Control Board and Section 6.01 of the Texas Clean Air Act. Failure to take such appeal constitutes acceptance by the applicant of all terms of the permit.
4. Construction Progress - Start of construction, construction interruptions exceeding 45 days and completion of construction shall be reported to the appropriate regional office of the Texas Air Control Board not later than ten (10) working days after occurrence of the event. This provision shall not apply to operating permits.
5. Record Keeping - Information and data concerning production, operating hours, sampling and monitoring data, if applicable, fuel type and fuel sulfur content, if applicable, shall be maintained in a file at the plant site and made available at the request of personnel from the Texas Air Control Board or any local air pollution control agency having jurisdiction. The file shall be retained for at least two years following the date that the information or data is obtained.

SPECIAL PROVISIONS

S-18612

1. This permit covers only those sources of emissions listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates" and those sources are limited to the emission limits and other conditions specified in that attached table.
2. The combustible material being processed in the oven shall contain no more than 50 ppm polychlorinated biphenyls (PCB).
3. The holder of this permit shall provide to the Texas Air Control Board (TACB) Regional Office in Fort Worth documentation that all material received to be cleaned in the oven has been certified by testing to contain no more than 50 ppm PCB. This documentation shall be provided for each source of combustible material within ten days of securing the new source.
4. The oven shall not be used to remove insulation from building wire or other types of wire with insulation containing chlorine.
5. Sampling and/or analysis of the combustible materials to be processed in the oven may be required at any time by a representative of the TACB or a representative of any local air pollution control program having jurisdiction.
6. There shall be no visible emissions from the oven.
7. Operating instructions shall be posted on the oven and it shall be operated in accordance with those instructions.
8. Heat shall be provided only by the combustion of pipeline quality natural gas, liquified petroleum gas or electric power.
9. The combustible material shall not exceed ten percent by weight of the total load to the oven.
10. Ash will be handled in such a way that it does not become airborne.
11. The temperature in the primary chamber shall not exceed 800°F. The temperature in the secondary chamber shall be maintained at no less than 1400°F.

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

9/86

S-18612

This table lists all sources of air contaminants on applicant's property emitted by the facility covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

AIR CONTAMINANT DATA													
EMISSION POINT ID (1)	SOURCE NAME (2)	EMISSION RATES*											
		VOC (3)		NOX (4)		SO2 (5)		PART (6)		CO (7)		(7)	
		#/HR	T/Y	#/HR	T/Y	#/HR	T/Y	#/HR	T/Y	#/HR	T/Y	#/HR	T/Y
BB-26	Heat Cleaning Oven	0.004	0.002	0.044	0.03	0.002	0.0012	0.03	0.018	0.021	0.013		

(1) Emission point identification - either specific equipment designation or emission point number from plot plan.

(2) Specific point source name. For fugitive sources use area name or fugitive source name.

(3) Volatile organic compounds as defined in General Rules 101.1.

(4) Total oxides of nitrogen.

(5) Sulfur dioxide.

(6) Particulate matter.

(7) Other contaminants. CO - Carbon Monoxide

(8) Fugitive emissions are an estimate only and should not be considered as a maximum allowable emission limit.

* Emission rates are based on the following operating schedule:

Hrs/day 10 Days/week 3 Weeks/year 40 or Hrs/year 1200

TEXAS AIR CONTROL BOARD
6330 Highway 290 East
Austin, Texas 78723

BOARD ORDER

F.J. DOYLE SCRAP METAL

NO. 88-07

On this the 15th day of July, 1988, the Texas Air Control Board (hereinafter referred to as "the Board" and "the TACB") considered the application of F.J. Doyle Scrap Metal (hereinafter referred to as "the Applicant") for a permit to construct a heat cleaning oven to be located 50 feet west of Poplar Street and 120 feet south of Cottonwood Street in Leonard, Fannin County, Texas; the agreement of the parties to Contested Case Hearing No. 245; the Hearings Examiner's Proposal for Decision; and the arguments of the parties.

After careful consideration, the Board makes the following Findings of Fact and Conclusions of Law.

Finding of Fact No. 1:

On January 22, 1988, the Applicant submitted a Board Form PI-1 General Application for Special Permit Application No. S-18612 to construct a heat cleaning oven to be located 50 feet west of Poplar Street and 120 feet south of Cottonwood Street in Leonard, Fannin County, Texas (hereinafter referred to as "the proposed facility").

Finding of Fact No. 2:

Notice of intent to construct the proposed facility was published in the public notice section and in a prominent location elsewhere in the February 23 and 24, 1988 issues of the Bonham Daily Favorite, a newspaper of general circulation in Fannin County.

Finding of Fact No. 3:

A sign meeting the requirements of Board Rule 116.7(b)(4) was placed on the site from February 23, 1988 through March 10, 1988.

Finding of Fact No. 4:

The TACB Executive Director issued Notice of Contested Case Hearing No. 245, concerning Special Permit Application No. S-18612 on May 13, 1988.

Finding of Fact No. 5:

Notice of Contested Case Hearing No. 245 was published in the Dallas Morning News on May 13, 1988 and the Texas Register on May 20, 1988.

Finding of Fact No. 6:

The Dallas Morning News is a newspaper of general circulation in Fannin County.

BOARD ORDER NO. 88-07
F.J. DOYLE SCRAP METAL
PAGE TWO

Finding of Fact No. 7:

Notice of Contested Case Hearing No. 245 provided that the Applicant and the Staff of the TACB (hereinafter referred to as "the Staff") were prospective parties to the hearing and any other person or organization desiring party status would have to file a written request by May 23, 1988.

Finding of Fact No. 8:

No requests for party status were received.

Finding of Fact No. 9:

A Prehearing Conference was held on June 7, 1988 at which the Applicant and the Staff appeared and announced that they believed the issues involved in the hearing could be settled by agreement.

Finding of Fact No. 10:

On June 27, 1988 the Applicant and the Staff submitted Agreed Findings of Fact and Conclusions of Law addressing all issues in this hearing.

Conclusion of Law No. 1:

The Board has jurisdiction to consider the application and a proposal for decision.

Conclusion of Law No. 2:

The only parties to the hearing are the Staff and the Applicant.

Finding of Fact No. 11:

The proposed facility is a heat cleaning oven which includes a primary processing chamber and an integral afterburner and will use either natural gas, liquified petroleum gas or electricity to power the unit.

Finding of Fact No. 12:

The proposed facility will be operated no more than 10 hours per day, 3 days per week, and 40 weeks per year.

Finding of Fact No. 13:

The proposed facility will be used to recover scrap metal by incinerating combustible materials from the metal. The primary material to be processed will be used electrical transformers to recover copper.

Finding of Fact No. 14:

Electrical transformers will be drained to remove excess oil prior to being processed in the facility.

BOARD ORDER NO. 88-07
F.J. DOYLE SCRAP METAL
PAGE THREE

Finding of Fact No. 15:

All transformers processed in the facility will have been tested and certified to contain no more than 50 parts per million (ppm) of polychlorinated biphenyls (PCBs).

Finding of Fact No. 16:

The combustible materials will not exceed ten percent by weight of the total load to the oven.

Finding of Fact No. 17:

The temperature in the primary chamber will not exceed 800 degrees Fahrenheit; the temperature in the secondary chamber will be maintained at no less than 1400 degrees Fahrenheit.

Finding of Fact No. 18:

Emissions from the proposed facility will not exceed the following amounts:

<u>Air Contaminant</u>	<u>Pounds Per Hour</u>	<u>Tons Per Year (tpy)</u>
Volatile Organic Compounds (VOC) (3)	0.004	0.002
Nitrogen Oxides (NO _x) (4)	0.044	0.03
Sulfur Dioxide (SO ₂) (5)	0.002	0.0012
Particulate Matter (PM) (6)	0.03	0.018
Carbon Monoxide (CO) (7)	0.021	0.013
Polychlorinated Biphenyls (PCB) (7)	6.75×10^{-6}	4.05×10^{-6}

Finding of Fact No. 19:

Emissions from the proposed facility will be less than 250 tpy of CO or NO_x and 25 tpy of any other air contaminant.

Finding of Fact No. 20:

The maximum ground level concentrations of contaminants from the proposed facility at or beyond the property line will not exceed the following levels:

<u>Air Contaminant</u>	<u>Concentration (ug/m³)</u> <u>(micrograms per cubic meter)</u>	<u>Averaging Period</u>
Particulate Matter	3.0	1 hour
Sulfur Oxides	0.24	30 minutes
Nitrogen Oxides	0.09	annual
Carbon Monoxide	2.1	1 hour
PCB	8.2×10^{-4}	30 minutes
PCB	1.4×10^{-5}	annual

BOARD ORDER NO. 88-07
F.J. DOYLE SCRAP METAL
PAGE FOUR

Finding of Fact No. 21:

The concentrations listed in Finding of Fact No. 20 will decrease as the averaging period increases.

Conclusion of Law No. 3:

The primary National Ambient Air Quality Standards (NAAQS) for air contaminants emitted from the proposed facility are as follows:

Contaminant	Allowable Concentration	Averaged Over:
PM	150 ug/m ³	24 hours
	50 ug/m ³	1 year
SO ₂	365 ug/m ³	24 hours
	80 ug/m ³	1 year
NO _x	100 ug/m ³	1 year
CO	40,000 ug/m ³	1 hour
	10,000 ug/m ³	8 hours

Conclusion of Law No. 4:

The primary NAAQS are the same as the secondary NAAQS, except for CO, for which there is no secondary standard, and SO₂, for which the secondary standard is 1,300 ug/m³, averaged over 3 hours.

Conclusion of Law No. 5:

The primary NAAQS are set to protect the public health with an adequate margin of safety. The secondary NAAQS are designed to protect the public welfare from any known or anticipated adverse effects of a pollutant.

Conclusion of Law No. 6:

The maximum concentrations referred to in Finding of Fact No. 33 (the predicted maximum concentrations) do not show a violation of any primary or secondary NAAQS.

Finding of Fact No. 22:

The predicted maximum concentrations for the contaminants from the proposed facility for which there are no NAAQS are not high enough to injure any person's health or property, injure animal life or vegetation or interfere with the normal use and enjoyment of animal life, vegetation, or property.

Finding of Fact No. 23:

The Leonard Elementary, Middle and High Schools are within 3,000 feet of the proposed facility.

BOARD ORDER NO. 88-07
F.J. DOYLE SCRAP METAL
PAGE FIVE

Finding of Fact No. 24:

The predicted maximum concentrations for the contaminants from the proposed facility are not high enough to cause any short term or long term side effects to individuals attending the Leonard Elementary, Middle, or High Schools.

Finding of Fact No. 25:

There will be no nuisance odor from the proposed facility.

Finding of Fact No. 26:

Emissions from the proposed facility will not cause or contribute to a condition of air pollution.

Finding of Fact No. 27:

The emissions from the oven stack will exhibit an opacity of 5% or less.

Conclusion of Law No. 7:

The emissions from the stack will not result in a violation of TACB Rules 111.21 and 111.26 on allowable opacity.

Conclusion of Law No. 8:

The allowable mass PM emission rate from the stack is 2.3 pounds per hour.

Conclusion of Law No. 9:

The emissions from the proposed facility will not violate TACB Rule 111.51 on allowable mass PM emission rates.

Conclusion of Law No. 10:

The predicted maximum concentrations of PM do not exceed the following ground level concentrations allowed at the property line by TACB Rule 111.52:

- (a) 100 ug/m³ averaged over 5 hours,
- (b) 200 ug/m³ averaged over 3 hours, and
- (c) 400 ug/m³ averaged over 1 hour.

Finding of Fact No. 28:

0.4 ppm is equal to 1040 ug/m³.

Conclusion of Law No. 11:

The predicted maximum concentrations for SO₂ do not exceed the net ground level concentration of 0.4 ppm averaged over 30 minutes that TACB Rule 112.9 allows at the property line.

Finding of Fact No. 29:

The proposed facility will not emit inorganic fluoride, beryllium or lead.

Conclusion of Law No. 12:

TACB Regulation III, relating to toxic materials, applies only to facilities emitting inorganic fluoride, beryllium or lead.

Conclusion of Law No. 13:

TACB Regulation III does not apply to the proposed facility.

Conclusion of Law No. 14:

The proposed facility is composed only of stationary sources.

Conclusion of Law No. 15:

TACB Regulation IV, relating to control of air pollution from motor vehicles, does not apply to the proposed facility.

Conclusion of Law No. 16:

Fannin County is not included in the counties to which TACB Regulation V applies.

Conclusion of Law No. 17:

TACB Regulation V does not apply to the proposed facility.

Finding of Fact No. 30:

The proposed facility will not use a gas-fired steam generating unit or manufacture nitric acid.

Conclusion of Law No. 18:

TACB Regulation VII applies only to facilities using gas-fired steam generating units or manufacturing nitric acid.

Conclusion of Law No. 19:

TACB Regulation VII does not apply to the proposed facility.

Conclusion of Law No. 20:

The Applicant will comply with TACB Regulation VIII, relating to control of air pollution episodes, to the extent necessary.

Finding of Fact No. 31:

The proposed facility will not use a catalyst regeneration of a petroleum or petrochemical process system, a basic oxygen furnace, a fluid-coking unit, an iron cupola or a blast furnace.

Conclusion of Law No. 21:

TACB Regulation IX, relating to control of CO, applies only to facilities using the processes or equipment referred to in Finding of Fact No. 31.

Conclusion of Law No. 22:

TACB Regulation IX does not apply to the proposed facility.

Conclusion of Law No. 23:

The proposed facility is not any kind of waste management facility.

Conclusion of Law No. 24:

TACB Regulation X, relating to hazardous waste or solid waste management facilities, and TACB Regulation XI, relating to municipal solid waste facilities, do not apply to the proposed facility.

Conclusion of Law No. 25:

The proposed facility will operate in compliance with all rules and regulations of the TACB.

Finding of Fact No. 32:

The control technology for the proposed facility consists of the limitations on the materials to be processed, and the restrictions on temperature and residence time in the heat cleaning oven.

Finding of Fact No. 33:

Additional controls would be either economically unreasonable or technically impracticable given the quantity of air contaminants that will be emitted.

Ultimate Statutory Finding of Fact No. 1:

The proposed facility will utilize at least the best available control technology, with consideration given to the technical practicability and economic reasonableness of reducing or eliminating the emissions resulting from the facility.

Finding of Fact No. 34:

The proposed facility will not emit radon-222, mercury, vinyl chloride, radionuclides, benzene, asbestos, or inorganic arsenic.

Conclusion of Law No. 26:

The proposed facility will not emit any of the hazardous air pollutants regulated under the National Emission Standards for Hazardous Air Pollutants (NESHAPs).

Conclusion of Law No. 27:

The NESHAPs regulations do not apply to the proposed facility.

Finding of Fact No. 35:

The proposed facility is not one listed in the Standards of Performance for New Stationary Sources (NSPS).

Conclusion of Law No. 28:

The NSPS regulations do not apply to the proposed facility.

BOARD ORDER NO. 88-07
F.J. DOYLE SCRAP METAL
PAGE EIGHT

Finding of Fact No. 36:

The proposed facility will not emit as much as 100 tpy of any air contaminant.

Finding of Fact No. 37:

The proposed facility is not a change to any existing facility.

Conclusion of Law No. 29:

The Prevention of Significant Deterioration (PSD) regulations do not apply to new facilities (those that are not changes to existing facilities) unless they emit at least 100 tpy of some air contaminant.

Conclusion of Law No. 30:

The PSD regulations do not apply to the proposed facility.

Conclusion of Law No. 31:

The requirements of Title 40 of the Code of Federal Regulations, Part 51, Subpart I (40 CFR Part 51, Subpart I) do not apply to new facilities unless they emit at least 100 tpy of some air contaminant.

Conclusion of Law No. 32:

40 CFR Part 51, Subpart I does not apply to the proposed facility.

Conclusion of Law No. 33:

No facility is a major modification under any new source review requirement of the Federal Clean Air Act or the regulations promulgated thereunder unless it is a change to an existing facility, and no facility is a major stationary source under any new source review requirement of the Federal Clean Air Act or the regulations promulgated thereunder unless it emits at least 100 tpy of some air contaminant.

Conclusion of Law No. 34:

The proposed facility is not a major stationary source or a major modification under any new source review requirement of the Federal Clean Air Act or the regulations promulgated thereunder.

Ultimate Statutory Finding of Fact No. 2:

The emissions from the proposed facility will not contravene the intent of the Texas Clean Air Act, including protection of the health and physical property of the people.

Conclusion of Law No. 35:

Chapter 171 of the Tax Code of the State of Texas requires that a franchise tax be imposed on each corporation that does business, is chartered, or authorized to do business in this state.

Finding of Fact No. 38:

Frank J. Doyle Scrap Metal is not a corporation.

BOARD ORDER NO. 88-07
F.J. DOYLE SCRAP METAL
PAGE NINE

Conclusion of Law No. 36:

Frank J. Doyle Scrap Metal does not owe a tax to the State under Chapter 171 of the Tax Code.

Finding of Fact No. 39:

The General and Special Provisions in Exhibit A should be included in any permit issued to the applicant to control and monitor emissions.

Conclusion of Law No. 37:

The General and Special Provisions in Exhibit A should be made a part of the Special Permit.

NOW THEREFORE, in accordance with the above Findings of Fact and Conclusions of Law, the Texas Air Control Board hereby directs the Executive Director to issue a special permit to construct to F.J. Doyle Scrap Metal with the general and special provisions contained in the attached Exhibit A.

PASSED AND APPROVED at the regular meeting of the Texas Air Control Board in Austin, Texas on this the 15th day of July, 1988.

TEXAS AIR CONTROL BOARD

BY: Dick Whittington
Dick Whittington, P.E., Chairman

Otto R. Kirze
Otto R. Kirze, Ph.D., P.E., Member

Bob G. Bailey
Bob G. Bailey, Vice-Chairman

Hubert Oxford, III
Hubert Oxford, III, Member

John L. Blair
John L. Blair, Member

William H. Coonrup
William H. Coonrup, Member

Marcus M. Key
Marcus M. Key, M.D., Member

C.H. Rivers
C.H. Rivers, Member

Mary Anne Wyatt
Mary Anne Wyatt, Member

BOARD ORDER NO. 88-07
F.J. DOYLE SCRAP METAL
PAGE TEN

ATTEST:



Allen Eli Bell
Executive Director

(SEAL)

APPENDIX
LIST OF HAZARDOUS GASES OF ENVIRONMENT



ACKNOWLEDGEMENT OF NOTIFICATION
OF REGULATED WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Regulated Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

TXD984865139

INSTALLATION ADDRESS

F. J. DOYLE SALVAGE TRANSFORMERS
PO BOX 312
LEONARD, TX 75452
F. J. DOYLE OWNER
355 E. COTTONWOOD
LEONARD, TX 75452

EPA Form 8700-12A (6-90)

John Hall, *Chairman*
Pam Reed, *Commissioner*
Peggy Garner, *Commissioner*
Anthony Grigsby, *Executive Director*



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

November 29, 1993

Dear Generator:

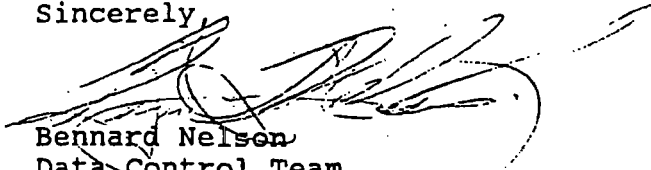
Enclosed is a copy of your new or updated Notice of Registration (NOR). The Data Control team processes updates in the order that the information is received. If you have submitted several requests for changes or updates they may or may not be reflected on this NOR.

In the case that you need further changes/additions to your NOR, there are three NOR forms you might use. NOR forms have been specifically developed for 1) adding waste streams and 2) adding waste management units to an existing NOR. It will be the policy of the Waste Evaluation Section to request that you submit all changes and additions on the appropriate NOR form. The forms are designed to streamline the processing of your NOR, and to ensure an expedient return of a new NOR to the generator. The third and final NOR form is for initial notifications for new facilities. Any administrative changes, i.e., company name changes, contact person, waste management practices, additional EPA codes must be submitted by letter.

Please take the time now to review your new NOR carefully checking for oversights or discrepancies. If there are multiple incorrect entries on your NOR, we urge you to make an appointment to visit with the Data Control Team so these problems can be handled expeditiously.

We look forward to your comments and working with you to insure that your NOR accurately reflects your hazardous or industrial waste management activities. If you need additional information, assistance, or copies of the forms contact the Waste Evaluation Section at (512) 908-6832.

Sincerely,


Bennard Nelson
Data Control Team
Industrial and Hazardous Waste Division

BN:bn/cw

*** TEXAS WATER COMMISSION ***
Notice of Registration
Industrial and Hazardous WastePage: 1
Date: 11/18/93

This registration does not constitute authorization of any waste management activities or facilities listed below. The registration reflects hazardous and/or industrial waste generation and management activities for which the registrant has provided notification. Requirements for solid waste management are provided by Texas Administrative Code section 335 of the rules of the Texas Water Commission (TWC). Changes or additions to waste management methods referred to in this notice require written notification to the TWC.

Solid Waste Registration Number: 80951 EPA Id: TXD980865109

The Solid Waste Registration Number provides access to computerized and filed information pertaining to your operation. Please refer to that number in any correspondence.

Company Name: F J Doyle Salvage Transformers
Site Name: F J Doyle Salvage Transformers
Site Location: 305 E Cottonwood, Leonard, TX 75452
Contact: Doyle, F. J.

District: 4
County: 74 Fannin

Initial Registration Date: 07/21/1993
Last Amendment Date: 07/27/1993
Last Date NOR Computer update: 10/28/1993
Phone: 903-587-3342

Title:

Mailing Address: P.O. Box 312
Leonard, TX 75452

Site Street Address: 305 E Cottonwood
Leonard, TX 75452

Registration Status: Active HW Permit #:
Registration Type: Generator Transporter
Transporter Type: Transport own waste Transporter Waste Class: 1

Business Description:
Primary SIC Code:
Handler Status:

Operator Information
Name:
Address:

Owner Information
Name:
Address:

As of 07/27/1993 - the next unassigned sequence number for WASTES is 0004 and
the next unassigned sequence number for UNITS is 004.

Section 335, Chapter 31 of the Texas Administrative Code specifies the notification, record keeping, manifesting and reporting requirements for hazardous and industrial solid wastes.

*** TEXAS WATER COMMISSION ***
Notice of Registration
Industrial and Hazardous WastePage: 2
Date: 11/18/93

**** WASTE INFORMATION ****

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio- active	TWC Audit Complete
------------------------	----------------	--------	-------------------	-------------------------------	------------------	-----------------------

***** Active Wastes *****

00012061	1	Active	07/27/93	On/Off		No
----------	---	--------	----------	--------	--	----

Description from Generator: Used oil from non-PCB Transformers being scrapped out for salvage; initial generation: 1/86

Form Code: 206 Waste oil
Current Management Units: Misc Store Container 001
* Origin Codes: 3 From non-haz waste mgmt

00023041	1	Active	07/27/93	On/Off		No
----------	---	--------	----------	--------	--	----

Description from Generator: Ash residue from furnace used to remove varnish from copper wire; initial generation: 1/86

Form Code: 304 Other "dry" ash, slag, or thermal inorgan. residue
Current Management Units: Thermal Process Unit 002
* Origin Codes: 3 From non-haz waste mgmt

00039012	2	Active	07/27/93	On/Off		No
----------	---	--------	----------	--------	--	----

Description from Generator: General plant refuse from office and shop

Form Code: 901 Plant production refuse
Current Management Units: Misc Store Container 003
* Origin Codes: 1 Onsite-process/service

* The first value is considered the primary value (e.g. primary origin code).

Refer to 40 CFR Part 261 for Descriptions of EPA Hazardous Waste Numbers.

IHW020

*** TEXAS WATER COMMISSION ***
Notice of Registration
Industrial and Hazardous WastePage: 3
Date: 11/18/93

**** UNITS AT THIS SITE MANAGING WASTE ****

Unit Number	Unit Type	Unit Status	Date of Status	Classes of Waste Managed in Unit Onsite / Offsite	Unit Permit Number	Unit # on Permit	Regulatory Status	Deed Recording Needed/Date
-------------	-----------	-------------	----------------	---	--------------------	------------------	-------------------	----------------------------

** 'Active' & 'Closure Pending' Units **

001	Misc Store Container	Active	07/27/93	1/ NA	NA	NA	Non-Hazardous Regulated	NA /
Description from Company: Various storage containers 1 x375 gallon, 2 x 500 gallon and 55 gallon drums. Stored on concrete pad								
System Types: 141 Storage								
Wastes Currently Managed in Unit: 00012061 Used oil f								

002	Thermal Process Unit	Active	07/27/93	1/ NA	NA	NA	Non-Hazardous Regulated	NA /
Description from Company: High temperature oven to burn varnish off copper								
System Types: 011 High temperature metals recovery								
Wastes Currently Managed in Unit: 00023041 Ash residu								

003	Misc Store Container	Active	07/27/93	2/ NA	NA	NA	Non-Hazardous Regulated	NA /
Description from Company: Dumpster, 4 yd for accumulation of plant trash								
System Types: 141 Storage								
Wastes Currently Managed in Unit: 00039012 General pl								

As of 07/27/1993, the next unassigned sequence number for UNITS is 004.

000361

APPENDIX G
EUBANK COMPLIANCE DOCUMENTATION

APPENDIX G.1

January 17, 1984

Request for Issuance of a Civil Complaint -- TSCA No. TX-83-08-748
Frank J. Doyle, Leonard, Texas

Norman E. Dyer, Ph.D., Chief
Pesticides and Toxic Substances Branch (6AW-P)

Barbara Greenfield, Team Leader
Solid Waste and Emergency Response Team
Office of Regional Counsel (6ORC)

A TSCA inspection was conducted at Mr. Doyle Transformer Salvage operation on August 30, 1983. The following is a summary of the violations noted during the inspection and a recommendation for civil action.

SUMMARY

At the time of the inspection, Doyle salvage/junk operation had about 150 transformers, 100 empty casings, transformer parts, and 1-500 gal and 1-900 gal oil storage tanks. The two tanks were not marked containing PCBs. The sample from the 500 gal tank contained 82.9 ppm of PCBs.

No PCB records of transactions were kept. No analysis of the tanks contents to assure that the transformers are non-PCB. No SPCC plan prepared and implement.

VIOLATIONS

Marking	761.40(a)(9)	Failure to mark 2 tanks containing PCBs.
Storage	761.65(c)(7)	Failure to prepare and implement an SPCC.
	761.65(c)(8)	Failure to keep batch records.

6AW-P: MONTER: X9740: 1-17-84

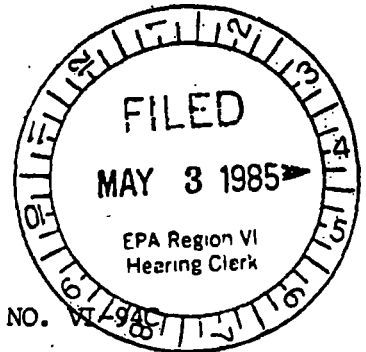
6AW-P
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RECOMMENDATION

We recommend a civil complaint be issued to Mr. Frank P. Boyle, Trans-
former Salvage, Leonard, Texas, with a proposed penalty of \$3,000.
The penalty calculation follows:

Parking	Level 3 and Minor	\$1,500
Storage	Level 3 and Minor	<u>1,500</u>
	TOTAL PROPOSED PENALTY	\$3,000

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION VI
DALLAS, TEXAS



IN RE:

FRANK J. DOYLE
LEONARD, TEXAS

RESPONDENT.

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§
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§

TSCA DOCKET NO. VI-94C-179

CONSENT AGREEMENT

AND

FINAL ORDER

PRELIMINARY STATEMENT

1. This proceeding for the assessment of a civil penalty was instituted pursuant to Section 16 of the Toxic Substances Control Act, as amended (TSCA), 15 U.S.C. 2615. The proceeding was instituted by Complaint and Notice of Opportunity for Hearing served upon Frank J. Doyle, 305 Cottonwood Street, Leonard, Texas, hereinafter referred to as "Respondent", on or about January 30, 1984, by certified mail, return receipt requested No. P 455 380 909, charging Respondent with failure to properly mark a PCB container with the M_L PCB label, improperly storing PCBs by failing to prepare and implement a Spill Prevention Control and Countermeasure (SPCC) Plan, and failing to record batches of PCBs added to or taken from a PCB container, in violation of Section 15(1)(C) of TSCA, 15 U.S.C. 2614(1)(C).

2. Respondent admits the jurisdictional allegations of the Complaint. Respondent neither admits nor denies the specific factual allegations of the Complaint or the facts or conclusions set out in the Findings of Fact and Conclusions of Law below.

3. Respondent hereby unconditionally waives its right to a hearing on any issue of law or fact herein. Such waiver shall become unconditional upon the Complainant's execution of the Consent Agreement and the Regional Administrator's approval of same as indicated by his entry of the Final Order incorporated herein and made a part hereof.

4. Since the filing of the complaint, Respondent has stated and verified to Complainant that the violations cited in the complaint have been corrected and the Respondent is now in full compliance with TSCA and the regulations thereunder.

5. Respondent consents to the issuance of said Final Order and consents to the payment of a civil penalty in the amount set out in said Order.

FINDINGS OF FACT

6. On or about August 30, 1983, Respondent was operating a transformer salvage yard operation at a location on the corner of Cottonwood and Poplar Streets in Leonard, Texas.

7. On August 30, 1983, Respondent was inspected by a representative of EPA pursuant to Section 11 of TSCA, 15 U.S.C. 2610.

8. On August 30, 1983, a written notice of inspection was issued by an EPA representative at the commencement of the inspection to a representative of Respondent as is required by Section 11(a) of TSCA, 15 U.S.C. 2610(a).

9. At the time of the inspection, Respondent had one 500 gallon storage container, containing liquid PCBs greater than 50 ppm, located on his property and in his possession and control.

10. On August 30, 1983, Respondent had failed to mark his 500 gallon storage container, which contained liquid PCBs with a concentration of 82.9 ppm PCBs, with the M_L PCB label, as required by 40 CFR §761.40.

11. On the date of the inspection, Respondent had neither prepared nor implemented a SPCC Plan for its 500 gallon oil storage container containing liquid PCBs, as required by 40 CFR §761.65(c)(7)(ii).

12. Further, Respondent at the time of the inspection failed to keep batch records on his 500 gallon PCB storage container, as required by 40 CFR §761.65(c)(8).

CONCLUSIONS OF LAW

13. Respondent is a "person" as that term is defined in 40 CFR §761.3 and as such is subject to Part 761 of the regulations, 40 CFR §761.1(b).

14. 40 CFR §761.40 requires PCB containers containing PCBs in concentrations of 50 to 500 ppm to be marked with the M_L PCB label.

15. Therefore, Respondent has violated Section 15(1)(C) of TSCA, 15 U.S.C. 2614(1)(C), by failing to mark a PCB storage container with the M_L PCB label as required by 40 CFR §761.40, a rule promulgated pursuant to Section 6(e) of the Act, 15 U.S.C. 2605(e).

16. 40 CFR §761.65(c)(7)(ii) requires owners or operators of any facility using bulk storage containers for liquid PCBs to prepare and implement a SPCC Plan.

17. 40 CFR §761.65(c)(8) requires storage containers for the storage of liquid PCBs to have a record, for each batch of PCBs, which includes the quantity of the batch and the date the batch was added to the container. The record shall also include the date, quantity, and disposition

of any batch of PCBs removed from the container.

18. Therefore, Respondent has violated Section 15(1)(C) of TSCA, 15 U.S.C. 2614(1)(C) by failing to prepare and implement a SPCC Plan and failure to record batch records on its PCB storage container as required by 40 CFR §761.65(c)(7)(ii) and by 40 CFR §761.65(c)(8), rules promulgated pursuant to Section 6(e) of the Act, 15 U.S.C. 2605(e).

Respondent hereby consents to the issuance of the following Order. The Office of Regional Counsel, EPA, Region 6, hereby recommends that the Regional Administrator issue the following order:

ORDER

Pursuant to the authority granted in Section 16(a)(2) of TSCA, 15 U.S.C. 2615(a)(2), upon consideration of the above Findings of Fact and Conclusions of Law which are hereby adopted and made a part hereof, and upon consideration of the nature, circumstances, extent, and gravity of the alleged violations, and with the respect to the Respondent, its ability to pay, the effect on its ability to continue to do business, its history of prior PCB violations, and Respondent's degree of culpability, and after consideration of the entire record herein, it is this 3rd day of May 1985, ORDERED that Frank J. Doyle, 305 Cottonwood Street, Leonard, Texas, pay a civil penalty in the amount of Fifty Dollars (\$50.00) within sixty (60) days of receipt of this ORDER, said penalty to be paid by Cashier's check or certified check payable to the Treasurer, United States of America and forwarded to the Regional Hearing Clerk, U.S. Environmental Protection Agency, Region 6, 1201 Elm Street, InterFirst Two Building, Dallas, Texas 75270.

Date: 4-12-85

Frank J. Doyle
Frank J. Doyle
Respondent

Date: 4/29/85

Bill Hathaway
for Allyn M. Davis, Director
Air and Waste Management Division
EPA, Region VI

It is so ORDERED. This ORDER shall become effective immediately.

Dick Whittington
Dick Whittington, P.E.
Regional Administrator
EPA, Region VI

Dated this 1st day of May 1985, at Dallas, Texas.

CERTIFICATE OF SERVICE

I hereby certify that the original of the foregoing Consent Agreement and Final Order was hand delivered to Mrs. Carmen Lopez, Regional Hearing Clerk, U.S. EPA, Region 6, Agency, 1201 Elm Street, InterFirst Two Building, Dallas, Texas 75270 a copy was placed in the Pouch Mail, addressed to Judge J. F. Greene, Administrative Law Judge, Office of Administrative Law Judges (A-110), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, D.C. 20460 and a copy was placed in the United States Mail, postage prepaid, certified mail, return receipt requested, No. P 003 078 810, addressed to Mr. Frank J. Doyle, P. O. Box 312, Leonard, Texas 75452 on this 3rd day of May 1985.


Lorraine Cummings
Clerk/Typist

APPENDIX C-2

CASE # FY90-3319

**SITE ASSESSMENT REPORT
FOR
Frank J. Doyle Transformer Salvage Site
Leonard, Fannin County, Texas**

June 17, 1991

Prepared for:

J. Chris Petersen
Deputy Project Officer
Emergency Response Branch
EPA - REGION 6

Contract Number: 68-WO-0037



ecology and environment, inc.

1509 MAIN STREET, DALLAS, TEXAS 75201, TEL. 214-742-6601
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000373



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International Specialists in the Environment

CASE # FY90-3319

Date: June 17, 1991

To: Robert Sullivan, OSC
EPA Region 6, Emergency Response Branch

Thru: J. Chris Petersen, DPO
EPA Region 6, Emergency Response Branch

Thru: Kishor Fruitwala, TATL
Region 6, Technical Assistance Team

From: Kent A. Bacon
Region 6, Technical Assistance Team

Subj: Site Assessment: Frank J. Doyle Transformer
Salvage Site, Leonard, Fannin County, Texas
TDD# T06-9010-80
PAN# ETX1204SA

I. PURPOSE

On September 28, 1990, a site assessment was conducted in response to a citizen's complaint concerning the improper handling and salvage of transformers at the Frank J. Doyle Transformer Salvage site in Leonard, Fannin County, Texas (Attachment A). The Region 6 TAT was tasked under TDD# T06-9008-28 to perform PCB screening of oil and soil using CHLOR-N-OIL™ and CHLOR-N-SOIL™ test kits. TAT members responding to this TDD were Kent Bacon and Pamela Pawelek. The objective of the screening mission was to decide if further investigation would be necessary to determine the presence and extent of PCB contamination caused by the site. Results of the oil and soil screening mission are discussed in Section III of this report.

Based on the oil and soil screening performed during site assessment on September 28, 1990, TAT was tasked on October 12, 1990 under another TDD# T06-9010-80, to collect soil, oil, wipe and sweep samples from the Frank J. Doyle Transformer Salvage site, surrounding residences, schools and drainage pathways. The objective of this sampling mission was to determine the presence and extent of PCB and Dioxin contamination of onsite and offsite locations. To assist in a concurrent Toxic Substances Control Act (TSCA) inspection, TAT relinquished duplicate oil samples, to TSCA Field Inspector Mr. Richard P. McLaughlin.

II. BACKGROUND

The site (Photograph #101) is located in Leonard, Fannin County, Texas, at the intersection of Cottonwood and Popular Streets and covers approximately 0.5 acres of land. The site is used for the storage and salvage of electrical transformers. The salvage process includes draining the transformers of any remaining oil and storing the oil in two storage tanks, 900 and 500-gallon capacities, and 55-gallon drums located on site. The transformers are then dismantled, the copper is placed in a kiln and the residual oil is allowed to burn off.

III. OBSERVATIONS

A. PHASE I - SCREENING MISSION

On September 28, 1990, TAT arrived at the site to perform oil and soil screening. TAT observed one 500-gallon tank (Photograph #212), one 900 gallon tank (Photograph #213) and fourteen 55-gallon drums (Photograph #111) that were located on site and being used for storage of transformer oil. Both tanks and all 55-gallon drums were filled to capacity with transformer oil. Stored on site were approximately 200 to 300 transformers to be salvaged (Photographs #105 & #107). One biased soil sample was collected by TAT from an oil stained area (Photograph #116) located at the northeast corner of the site. Another soil sample was collected by TAT from the school yard (Photograph #221), located at the east of the site. Both samples were screened for chlorinated compounds using the CHLOR-N-SOIL™ test kits. Oil samples were collected by Mr. Doyle in the presence of TAT, from two of the 55-gallon drums and from the 900-gallon tank. Each sample was screened by TAT for chlorinated compounds using the CHLOR-N-OIL™ test kits. Results of the screening are shown in Table III-A.

TABLE III-A
SCREENING MISSION RESULTS

Sample Locations	Matrix	Screening Results
Stained Area	Soil	Positive
School Area	Soil	Negative
55 Gallon Drum	Oil	No Result
900 Gallon Tank	Oil	Positive
55 Gallon Drum	Oil	Positive

All screening was performed under the criteria set forth in the Quality Assurance Sampling Plan - Phase I (Attachment J).

B. PHASE II - SAMPLING MISSION

On October 12, 1990, TAT and EPA-OSC Robert Sullivan arrived at the site to perform onsite oil, soil, wipe and sweep sampling as well as offsite soil and wipe sampling. Of the fourteen drums observed onsite during the previous assessment, only one drum contained oil (Photograph #214). Both the 900 and 500-gallon tanks and remaining drums had been drained of oil prior to TAT arrival and were in the process of being refilled. All samples were collected and prepared under the criteria set forth in the Quality Assurance Sampling Plan - Phase II (Attachment K).

B1. ON-SITE SAMPLING

The site was divided into three grids, approximately 63.5 feet long by 110 feet wide. One composite surface soil sample was collected at random locations from each grid. One grab surface soil sample was collected at the drum storage area. (Attachment C1: Soil Sample Location Map). A total of four soil samples were collected for PCB analysis.

Oil samples were collected (Attachment C2: Oil Sample Location Map) from the 500 gallon storage tank, approximately one-half full; the 900-gallon storage tank, approximately one-third full; one full 55-gallon drum and eleven transformers. Transformers were opened by the employees of Frank J. Doyle during normal daily operations. Samples were collected on the basis of presence of oil in the transformers. During the opening of the transformers, air monitoring was performed by TAT using a Photo-ionization Detector (Hnu) with a 10.2 eV probe. Readings obtained were 0.6 ppm/unit above background, with a background reading of 0.4 ppm/unit. Oil samples collected from the transformers were screened using the CHLOR-N-OILTM test kits. Samples that tested positive were sent to the laboratory for PCB analysis. The transformer with SN# 1752177-2, tested positive for chlorinated compounds and was sent for PCB analysis as sample #TRN-1. The transformer with SN# 74ZL809010, tested negative for chlorinated compounds and was sent for PCB analysis as sample #TRN-2 at the request of the OSC. Samples collected from the storage tanks and the 55-gallon drum were screened using the CHLOR-N-OILTM test kits (Photograph #203) and sent for PCB analysis. Results of screening are described in Table III-B.

Two sweep samples (one from the east and one from the west-side) were collected (Attachment C3: Sweep Sample Location Map) from the transformer dismantling building at unbiased locations. Sweep samples were collected by using cordless portable vacuum cleaners. Two sweep samples were sent for PCB analyses.

Two wipe samples were collected (Attachment C4: Wipe Sample Location Map) from the kiln located in the dismantling building. Samples were sent for PCB and dioxin analyses.

**TABLE III-B
SCREENING RESULTS**

Sample Locations	Matrix	Screening Results	Sample Number	Laborator Results
Transformer SN# 55J1948	Oil	Negative	N/A	
Transformer SN# 2791407	Oil	Negative	N/A	
Transformer SN# D642302-589	Oil	Negative	N/A	
Transformer SN# 2380299	Oil	Negative	N/A	
Transformer SN# 4608061481	Oil	Negative	N/A	
Transformer SN# 702K519010	Oil	Negative	N/A	
Transformer SN# 1752177-2	Oil	Positive	TRN-1*	ND
Transformer SN# 4683551006	Oil	Negative	N/A	
Transformer SN# 3063880283	Oil	Negative	N/A	
Transformer SN# 74ZL809010	Oil	Negative	TRN-2*	ND
Transformer SN# 5333602	Oil	Negative	N/A	
55 Gallon Drum	Oil	Negative	DRM-1*	ND
500 Gallon Tank	Oil	Negative	TNK-1*	ND
900 Gallon Tank	Oil	Positive	TNK-2*	ND

ND - Not Detectable

*Duplicate samples relinquished to TSCA inspector

B2. OFF-SITE SAMPLING

Offsite grab surface soil samples were collected (Attachment C1: Soil Sample Location Map) at the Doyle residence (Photograph #211), (b) (6) residence (Photograph #210), drainage pathways adjacent to the site (Photograph #219) and drainage pathways in the school yard (Photograph #221). A background grab surface soil sample was collected from the school practice field (Photograph #222), approximately 500 feet northeast of the site. A total of seven samples were collected for PCB analyses. One grab surface soil sample from the (b) (6) residence and one grab from the school yard were collected for dioxin analysis.

Offsite wipe samples were collected (Attachment C4: Wipe Sample Location Map) at the Doyle residence (Photograph #208), (b) (6) residence (Photographs #204 - #207) and at the school building (Photograph #220). A total of three wipe samples were collected for PCB analysis. Two wipe samples were collected, one from the (b) (6) residence (Photograph #204) and one from the school building (Photograph #220), for dioxin analysis. All soil and wipe samples were sent to the Chem-West Analytical Laboratories in Sacramento, California.

Due to the laboratory error, the wipe sample from the (b) (6) residence had to be resampled. The laboratory ran the sample and received poor recovery and did not have enough sample to re-run the analysis. Consequently, TAT was requested by the laboratory to resubmit another sample for analysis. On November 9, 1990, TAT members Kent Bacon and Kenneth Clark arrived at the (b) (6) residence at 1440 hours to obtain the wipe sample. The sample was collected and sent for PCB analysis by the Chem-West Analytical Laboratories. The sample was reportedly logged in at the laboratory under the wrong laboratory identification number. When this error was discovered, the sample was removed from the incorrect laboratory identification number and was never logged in with the correct laboratory identification number. Due to the delay in getting back the analytical data, TAT contacted the laboratory who informed TAT of the error. The wipe sample from the (b) (6) residence had to be resampled again due to the laboratory error. On January 25, 1991, TAT members Kent Bacon and Ky Nichols arrived at the (b) (6) residence at 1200 hours to obtain the wipe sample. The sample was collected and sent to the Chem-West Analytical Laboratories for PCB analysis.

C. SUMMARY OF OBSERVATIONS

The Dioxin/Furan sample results reported that all samples were non detect for 2,3,7,8 Tetrachlorodibenzo-p-dioxin and 2,3,7,8 Tetrachlorodibenzofuran. Equivalence Ratios for all other Chlorinated Dibenzo-p-dioxin and Chlorinated Dibenzofuran isomers were below the 1 ppb level of interest for 2,3,7,8 Tetrachlorodibenzo-p-dioxin and 2,3,7,8 Tetrachlorodibenzofuran. A summary of Dioxin sample results is located in Table III-E.

The sample results (TABLE III-C) show that three samples, SAL-S1 (89 ppm), SAL-S3 (71 ppm) and DRN-S3 (280 ppm) have Aroclor 1260 levels of greater than 50 ppm. Due to the elevated concentration level of Aroclor 1260 in sample # DRN-S3, the EPA-OSC requested that additional sampling be performed in the area where the sample #DRN-S3 was collected. On April 19, 1991, TAT members Kent Bacon and Anan Hammad collected four composite and one grab surface soil sample (Attachment C5: Soil Samples Collected on 4/19/91). Sampling was performed under the criteria set forth in the QASP addendum (dated 4/18/91). Samples were sent to the USEPA Laboratory in Houston, Texas for PCB analysis. Samples collected on April 19, 1991 revealed levels of PCB concentration ranging from 6.2 ppm to 271 ppm (Table III-D). The EPA-OSC informed TAT that the situation will be brought to the attention of TSCA officials for future activities and TAT will not take any further action until advised by the EPA.

TABLE III-C
SUMMARY OF ANALYTICAL DATA (PCB's)

ON-SITE SAMPLES:

Sample #	Locations	Matrix	Concentrations of Aroclor 1260
SAL-S1	Salvage Yard - North Grid	Soil	89.0 ppm
SAL-S2	Salvage Yard - Center Grid	"	41.0 "
SAL-S3	Salvage Yard - South Grid	"	71.0 "
SAL-S4	Salvage Yard - Drum Storage Area	"	10.0 "
SWP-1	Inside Dismantling Bldg-West Side	Sweep	97.0 ug/wipe
SWP-2	Inside Dismantling Bldg-East Side	Sweep	310.0 ug/wipe
DRM-1	Drum at Drum Storage Area	Oil	ND
TNK-1	500 Gallon Storage Tank	"	ND
TNK-2	900 Gallon Storage Tank	"	ND
TRN-1	Transformer From Salvage Yard	"	ND
TRN-2	Transformer From Salvage Yard	"	ND
KLN-W *	Kiln(Inside Dismantling Building)	Wipe	ND

OFF-SITE SAMPLES:

DOY-S	Doyle Residence	Soil	3.0 ppm
KTS-S *	(b) (6)	"	ND
DRN-S1	School Practice Field (backgrnd)	"	ND
DRN-S2	Drainage Pathway North of Site	"	11.0 ppm
DRN-S3	Drainage Pathway South of Site	"	280.0 "
SCH-S1	School Yard (North Ditch)	"	5.6 "
SCH-S2 *	School Yard (Ditch)	"	2.8 "
DOY-W	Doyle Residence	Wipe	ND
KTS-W3 *	(b) (6)	"	ND
SCH-W *	School Building Door	"	ND

* Analyzed for Dioxins (Attachment H)
ND - Not Detectable

TABLE III-D
SUMMARY OF ANALYTICAL DATA (PCB's)

SAMPLES COLLECTED ON 4/19/91:

Sample #	Locations	Matrix	Concentrations of Aroclor 1260
DRN-S3A	North East Drainage Ditch	Soil	58.0 ppm
DRN-S3B	South East Facility Drainage	"	6.2 "
DRN-S3C	South East Drainage	"	7.0 "
DRN-S3D	South Drainage	"	271.0 "
DRN-S3E	Grab Sample	"	166.0 "

Table III-E
SUMMARY OF ANALYTICAL DATA (DIOXIN)
 FORM 1 - QUANTITATION REPORT

PAGE 1 of 2
 DATE: 10/29/90
 LABORATORY: ChemWest

Ticket# CW-6899
 Project Name: Ecology & Environment, Inc.

		TOTAL ANALYTE QUANTITY FOUND (ppb or ng/g)														
CLIENT		GC/MS	GC/MS	INST.	2370						2378					
ID.	CW#	DATE	TIME	ID.	TCDD	TCDD	PeCDD	IkCDD	HxCDD	OCDD	TCDF	TCDF	PeCDF	IkCDF	HxCDF	OCDF
METHOD BLANK	6899-6MB	10/19/90	09:32	CW-2	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Detection Limit					0.025	0.038	0.046	0.079	0.084	0.10	0.028	0.040	0.029	0.039	0.060	0.092
MMS	6899-6MJS	10/19/90	10:07	CW-2	7.9	7.9	8.8	9.1	8.4	9.4	8.4	8.4	8.1	8.6	9.0	10.7
Detection Limit																
MMSD	6899-6MBSD	10/19/90	10:45	CW-2	7.5	7.5	8.7	9.1	8.4	9.3	8.1	8.1	8.2	8.6	9.0	10.7
Detection Limit																
PHK-W	6899-6B	10/19/90	11:19	CW-2	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Detection Limit					0.35	0.35	0.44	0.60	0.70	0.79	0.34	0.26	0.54	0.29	0.58	0.81
KLN-W	6899-7B	10/19/90	12:46	CW-2	ND	ND	ND	ND	ND	1.3	ND	ND	1.6	2.3	2.0	ND
Detection Limit					0.31	0.31	0.54	1.2	2.2		0.39	0.39				2.0
KIS-S	6899-9D	10/19/90	14:35	CW-2	ND	ND	ND	ND	ND	0.11	ND	ND	ND	ND	ND	ND
Detection Limit					0.024	0.024	0.037	0.042	0.071		0.018	0.018	0.031	0.034	0.038	0.096

g = MAXIMUM POSSIBLE CONCENTRATION

*C-TCDD: Carbon 13 labeled 2,3,7,8-tetrachlorodibenzodioxin (12 carbons)

*C-TCDF: Carbon 13 labeled 2,3,7,8-tetrachlorodibenzofuran (12 carbons)

*C-OCDD: Carbon 13 labeled octachlorodibenzodioxin (12 carbons)

706-9010-80

000382

Approved by: _____

TABLE III-E (CONTINUED)
FORM 1 - QUANTITATION REPORT

PAGE 2 of 2
DATE: 10/29/90
LABORATORY: ChemNesi

Ticket# CW-0099

Project Name: Ecology & Environment, Inc.

CLIENT ID.	CW#	GC/MS DATE	CC/MS TIME	INST. ID.	ABSOLUTE % RECOVERY of INTERNAL STANDARDS							SURROGATE % ACCURACY		
					%C-TCDD	%C-PeCDD	%C-1x2CDD	%C-1x3CDD	%C-OCDD	%C-TCDF	%C-PeCDF	%CI-TCDD	%C-1x2CDD	%C-1x3CDD
METHOD BLANK Detection Limit	6899-6MB	10/19/90	09:32	CW-2	60.8	74.7	77.6	65.9	46.0	63.6	75.1	104	88.7	103
MDS Detection Limit	6899-6MBS	10/19/90	10:07	CW-2	64.8	74.5	80.8	71.4	49.5	67.8	76.9	104	86.9	11
MISD Detection Limit	6899-6MBSD	10/19/90	10:45	CW-2	70.4	77.7	85.2	74.9	52.0	71.8	80.4	103	89.8	99.8
BIK-W Detection Limit	6899-6B	10/19/90	11:19	CW-2	69.7	76.4	86.2	73.9	51.4	70.8	82.7	90.1	89.0	102
KLN-W Detection Limit	6899-7B	10/19/90	12:46	CW-2	67.5	82.4	85.0	70.6	45.6	68.2	80.4	100	91.3	104
KIS-S	6899-9B	10/19/90	14:35	CW-2	71.5	85.6	87.4	72.5	45.8	74.0	85.2	102	90.2	103

INTERNAL STANDARDS

%C-TCDD = 13C12-2378-TCDD
%C-PeCDD = 13C12-12378-PeCDD
%C-1x2CDD = 13C12-123678-1x2CDD
%C-1x3CDD = 13C12-1234678-1x3CDD
%C-TCDF = 13C12-2378-TCDF

SURROGATES

%CI-TCDD = 37CL4-2378-TCDD
%C-1x2CDD = 13C12-123789-1x2CDD
%C-PeCDF = 13C12-12378-PeCDF
%C-1x3CDF = 13C12-1234678-1x3CDF

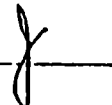
00383
Approved by: 

TABLE III-E (CONTINUED)
FORM 1 - QUANTITATION REPORT

PAGE 1 of 2

DATE: 10/29/90

LABORATORY: ChemWest

Ticket# CW-6899

Project Name: Ecology & Environment, Inc.

CLIENT ID.	CW#	GC/MS DATE	GC/MS TIME	INST. ID.	TOTAL ANALYTE QUANTITY FOUND (ppt or ng/L)											
					2378 TCDD	TCDD	PeCDD	HxCDD	HpCDD	OCDD	TCDF	TCDF	PeCDF	HxCDF	HpCDF	OCDF
					2378											
KIS-W Detection Limit	6899-10B	10/19/90	15:11	CW-2	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
					0.35	0.35	0.42	0.40	0.76	1.0	0.19	0.19	0.31	0.35	0.41	0.77
SCI-W Detection Limit	6899-21B	10/19/90	15:49	CW-2	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
					0.15	0.15	0.32	0.34	0.50	1.0	0.28	0.16	0.28	0.23	0.40	0.64
SCI-S2 Detection Limit	6899-22B1	10/19/90	16:20	CW-2	ND	ND	ND	ND	ND	ND	ND	ND	0.57	0.80	ND	ND
					0.10	0.12	0.27	0.25	0.20	0.50	0.42	0.20			0.39	0.24
SCI-S2 Detection Limit	6899-22B2	10/19/90	17:05	CW-2	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
					0.25	0.25	0.41	0.54	0.64	1.3	0.36	0.36	0.24	0.39	0.60	1.1

• = MAXIMUM POSSIBLE CONCENTRATION

*C-TCDD: Carbon 13 labeled 2,3,7,8-tetrachlorodibenzodioxin (12 carbons)

*C-TCDF: Carbon 13 labeled 2,3,7,8-tetrachlorodibenzofuran (12 carbons)

*C-OCDD: Carbon 13 labeled octachlorodibenzodioxin (12 carbons)

106-9010-RN

000384

Approved by: _____

[Signature]

TABLE III-E (CONTINUED)
FORM 1 - QUANTITATION REPORT

PAGE 2 of 2
DATE: 10/29/90
LABORATORY: ChemWest

Ticket# CW-6099
Project Name: Ecology & Environment, Inc.

CLIENT	CW#	GC/MS DATE	GC/MS TIME	INST. ID.	ABSOLUTE % RECOVERY of INTERNAL STANDARDS							SURROGATE % ACCURACY		
					%C-TCDD	%C-PeCDD	%C-IxCDD	%C-HpCDD	%C-OCDD	%C-TCDF	%C-PeCDF	%CI-TCDD	%C-IxCDD	%C-HpCDD
KIS-W Detection Limit	6899-100	10/19/90	15:11	CW-2	68.2	85.6	87.4	89.8	51.8	72.2	85.6	103	89.4	88.1
SCI-W Detection Limit	6899-218	10/19/90	15:49	CW-2	71.4	86.0	89.0	78.6	52.8	72.4	84.2	99.6	88.8	101
SCI-S2 Detection Limit	6899-2281	10/19/90	16:28	CW-2	11.5	13.7	14.6	14.5	11.1	7.6	19.2	97.2	75.3	156
SCI-S2 Detection Limit	6899-2282	10/19/90	17:05	CW-2	63.4	79.8	86.0	70.2	43.3	62.8	78.7	99.7	89.1	103

INTERNAL STANDARDS

%C-TCDD = 13C12-2378-TCDD
%C-PeCDD = 13C12-12378-PeCDD
%C-IxCDD = 13C12-123678-IxCDD
%C-HpCDD = 13C12-1234678-HpCDD
%C-TCDF = 13C12-2378-TCDF

SURROGATES

%CI-TCDD = 37C14-2378-TCDD
%C-IxCDD = 13C12-123789-IxCDD
%C-PeCDF = 13C12-12378-PeCDF
%C-HpCDF = 13C12-1234678-HpCDF

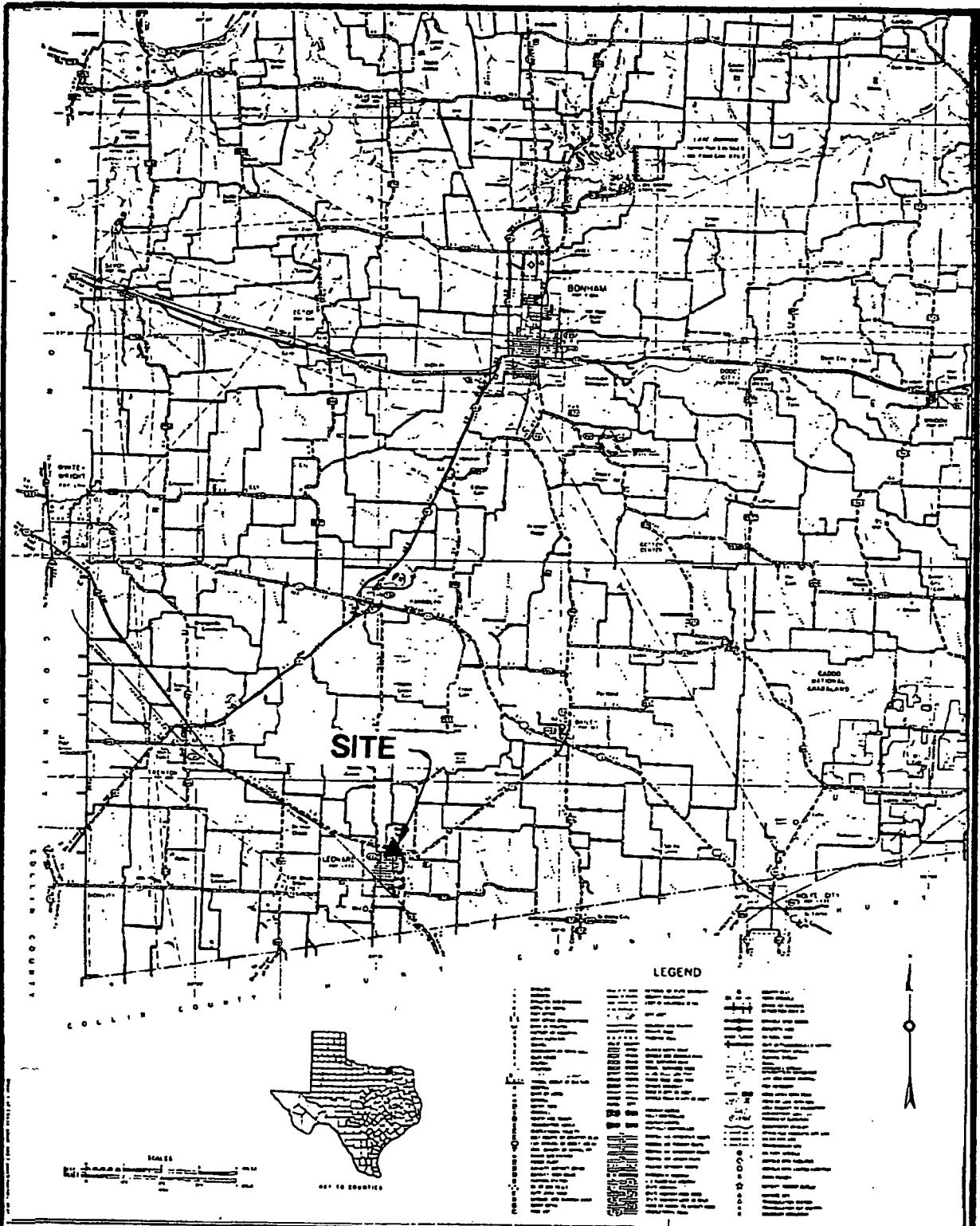
060385
Approved by: _____

[Signature]

ATTACHMENTS:

- A. Site Location Map
- B. Site Sketch
- C. Sample Location Maps:
 - C1 Soil Sample Location Map
 - C2 Oil Sample Location Map
 - C3 Sweep Sample Location Map
 - C4 Wipe Sample Location Map
 - C5 Soil Samples Collected on 4/19/91
- D Photographs (10 Pages)
- E. Unused Photographs and Negatives
- F. Record of Communication (10 Pages)
- G. Copies of Logbook Pages (1-8), (1-13)
- H. Copy of Analytical Results
- I. Copy of Analytical Results (4/19/91)
- J. Quality Assurance Sampling Plan - Phase I (Screening Mission)
- K. Quality Assurance Sampling Plan - Phase II (Sampling Mission)
- L. Copy of Access Agreement
- M. Copy of TDD#T06-9010-80 and Amendments A, B, and C

ATTACHMENT A



Ecology and Environment, Inc.
Technical Assistance Team
Region VI

CERCLIS/CASE#: FY90-3319

TDD# E06-9010-80

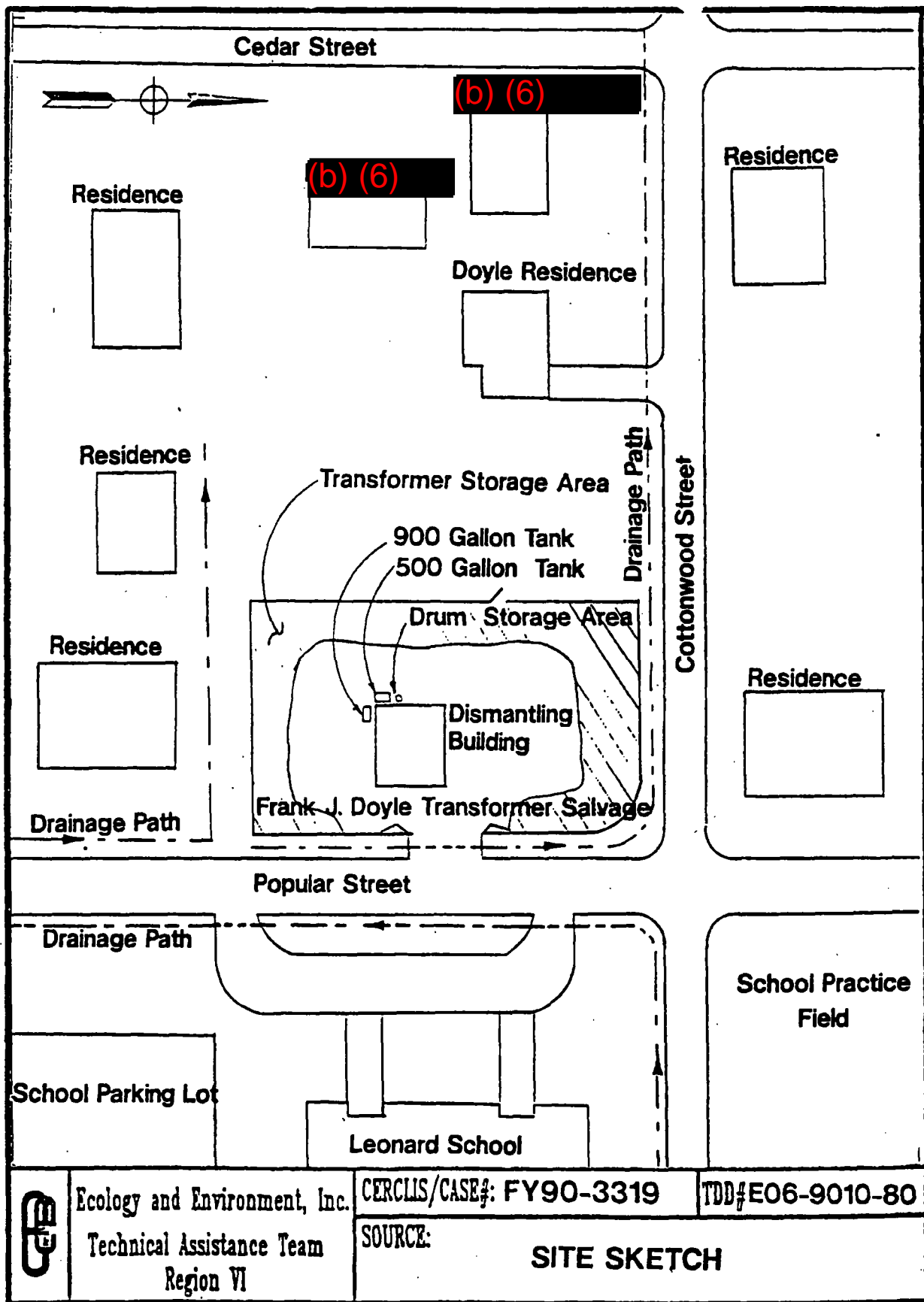
SOURCE:

STATE DEPARTMENT OF HIGHWAYS
AND PUBLIC TRANSPORTATION

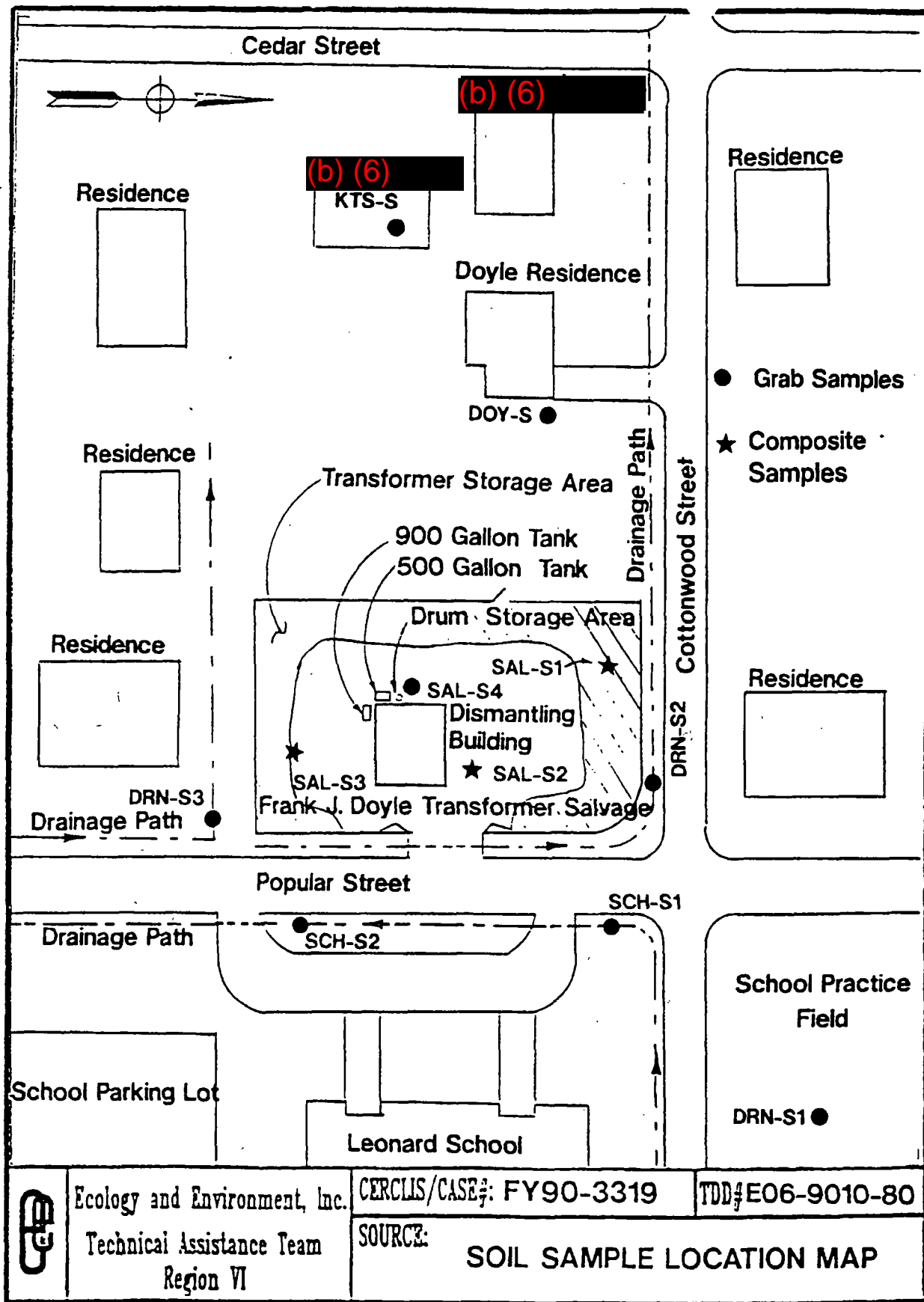
ATTACHMENT

000388

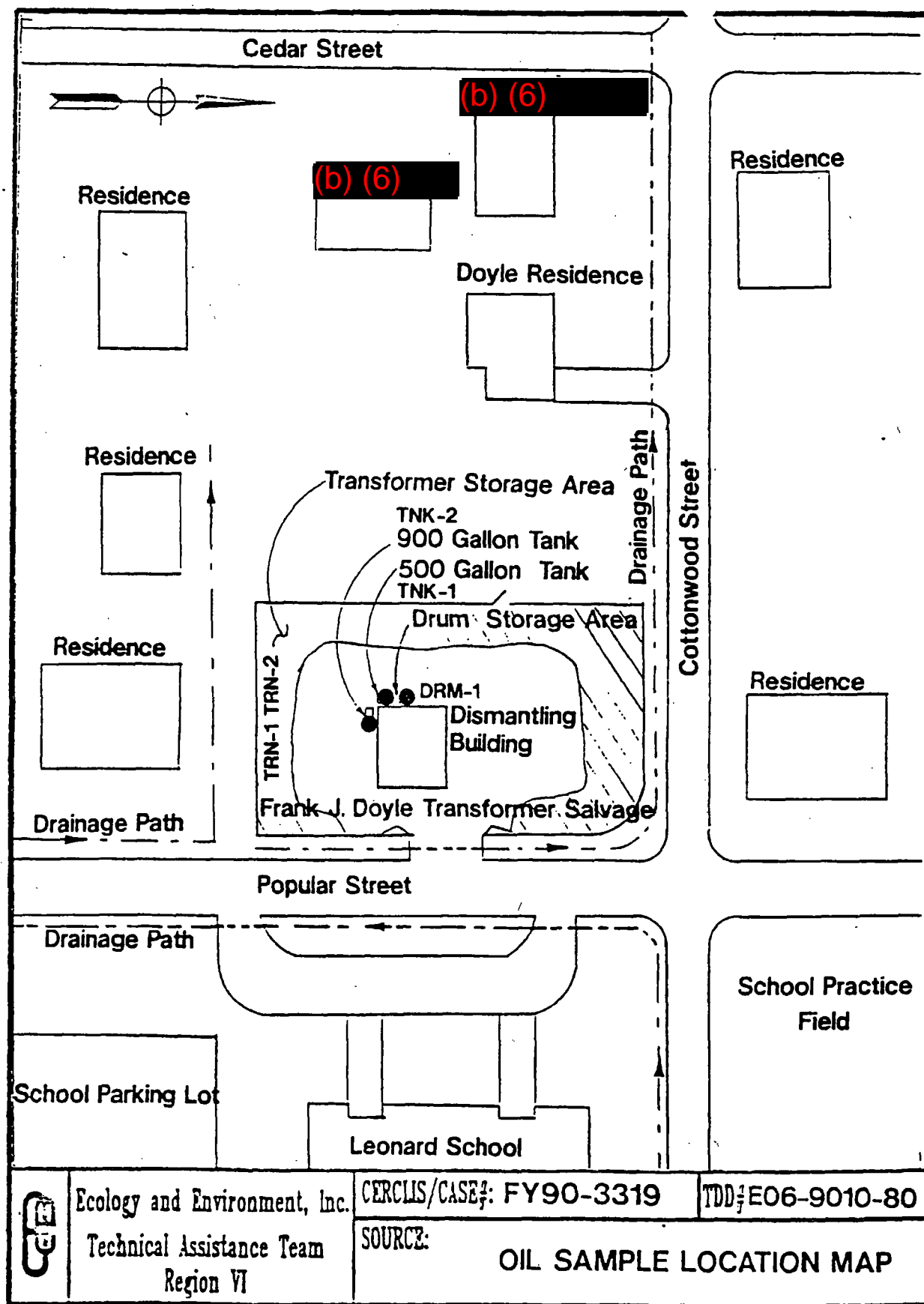
ATTACHMENT B



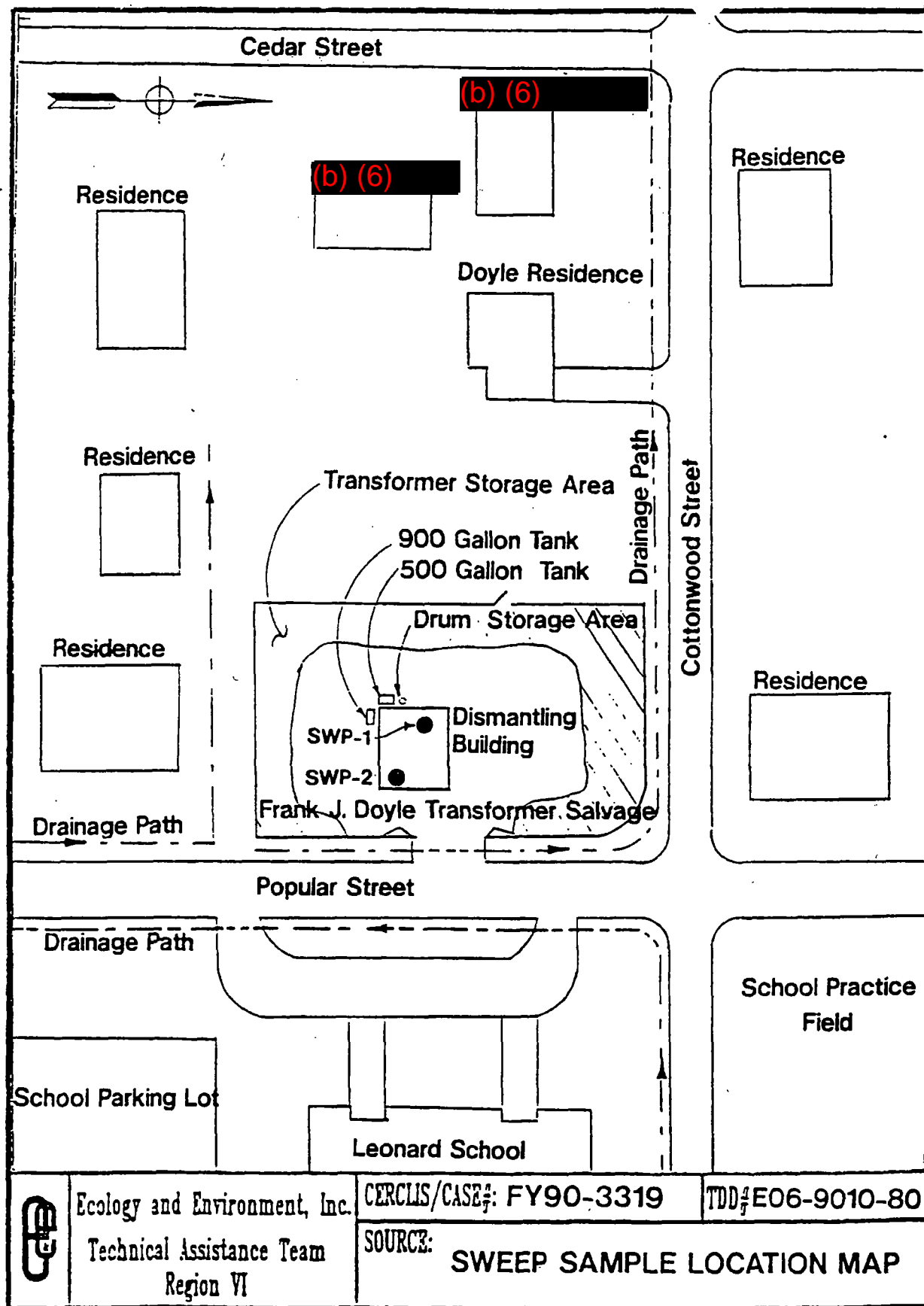
ATTACHMENT C



ATTACHMENT C1



ATTACHMENT C2



Ecology and Environment, Inc.
Technical Assistance Team
Region VI

CERCLIS/CASE#: FY90-3319

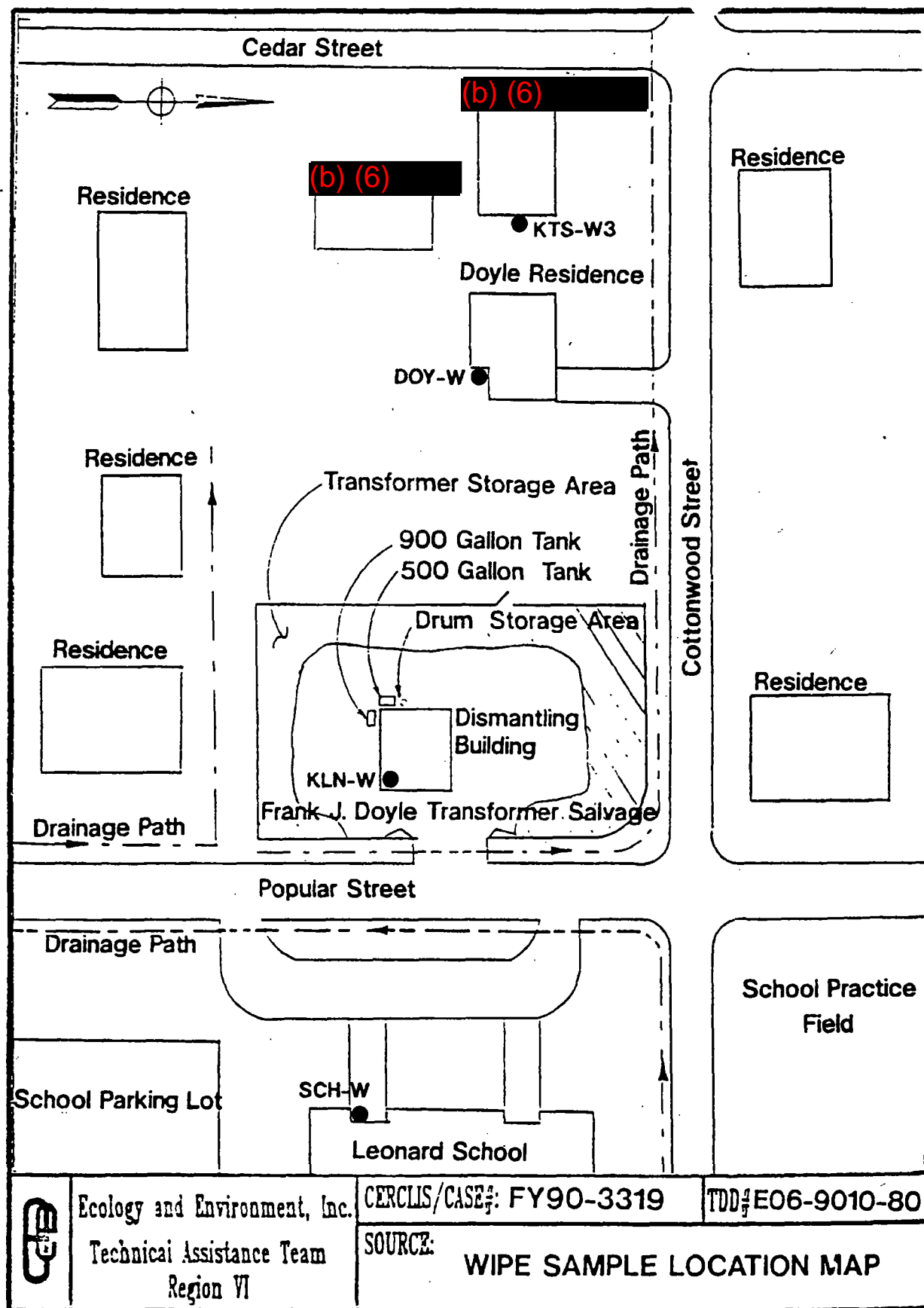
TDD#E06-9010-80

SOURCE:

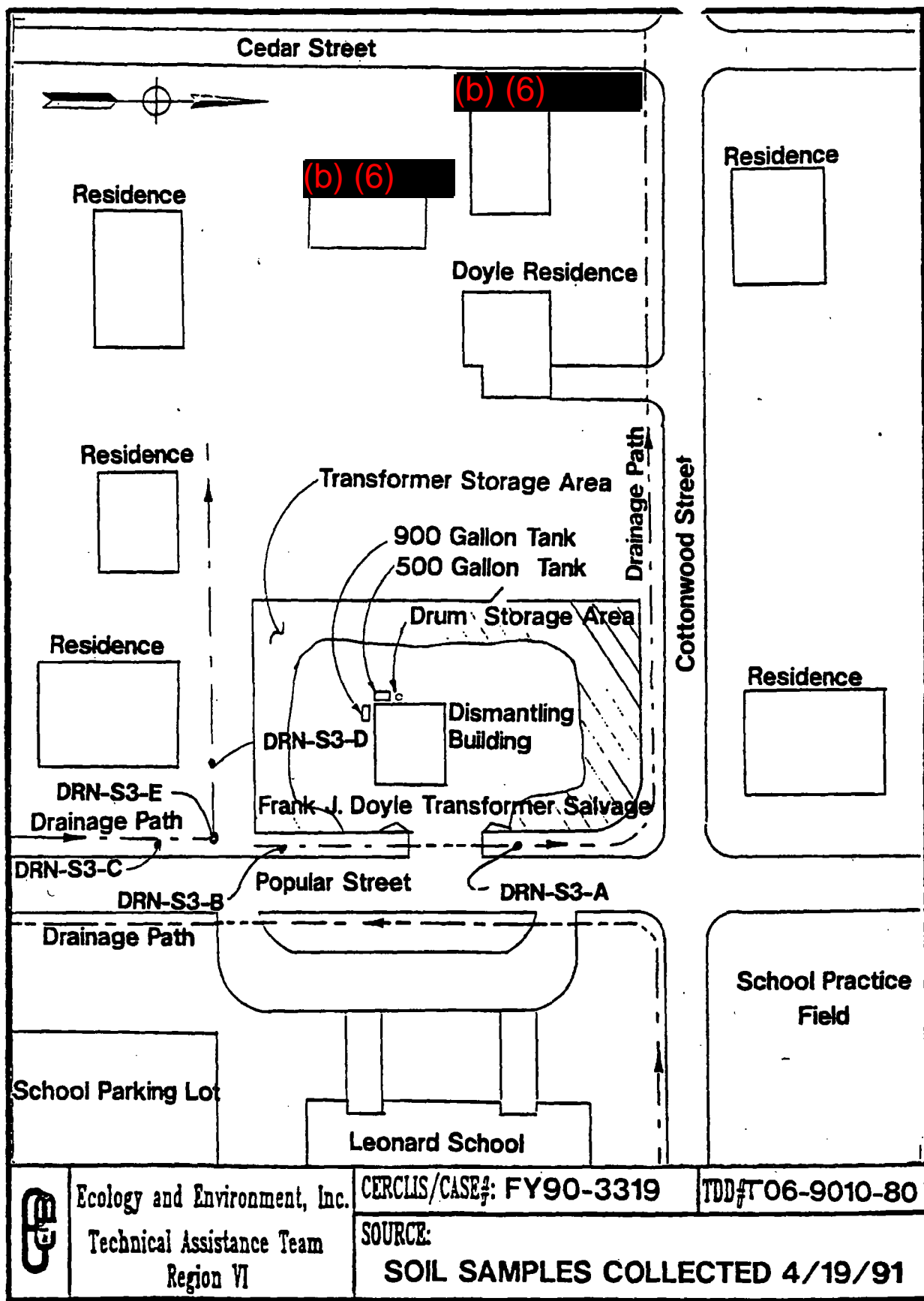
SWEEP SAMPLE LOCATION MAP

ATTACHMENT C3

000394



ATTACHMENT C4



Ecology and Environment, Inc.
Technical Assistance Team
Region VI

CERCLIS/CASE#: FY90-3319

TDD#T06-9010-80

SOURCE:

SOIL SAMPLES COLLECTED 4/19/91

APPENDIX

January 25, 1995

*(NOTE: FINAL VERSION
WAS APPARENTLY MAILED
FEB 2, 1995)*

Mr. Frank J. Doyle
P.O. Box 312
305 Cottonwood Street
Leonard, Texas 75452

Re: EPA PCB Inspections

Dear Mr. Doyle:

An EPA PCB Inspection was conducted at your facility on September 7, 1994. Previously, a PCB Inspection was conducted at your facility on July 20, 1990 and investigations by the EPA Emergency Response Branch Technical Assistance Team were conducted on October 12, 1990 and April 19, 1991. These inspections and investigations have determined through collection and analysis of soil samples that there are PCBs present at your site, in addition to offsite, in concentrations in excess of 50 ppm. 40 C.F.R. § 761.60(d)(1) states that spills and other uncontrolled discharges of PCBs at concentrations of 50 ppm or greater constitutes the disposal of PCBs. "Disposal" is defined in 40 C.F.R. § 761.3 as intentionally or accidentally to discard, throw away, or otherwise complete or terminate the useful life of PCBs and PCB Items. Disposal includes spills, leaks, and other uncontrolled discharges of PCBs as well as actions related to containing, transporting, destroying, degrading, decontaminating, or confining PCBs and PCB Items. 40 C.F.R. § 761.60(a) requires that PCBs at concentrations of 50 ppm or greater must be disposed of in an approved incinerator, approved chemical waste landfill, or a high efficiency boiler that meets certain criteria.

Based on the findings of the inspections and investigations, EPA is requesting that you initiate characterization and, if appropriate, cleanup of your site and appropriate offsite areas as soon as possible. The intent of this letter is to inform you of our findings and to solicit your intentions on this matter. Please contact me by February 9, 1995 at (214) 665-7576 or write to the above address. Failure to contact this office by February

9, 1995 could result in the issuance of a civil complaint with a civil penalty of up to Twenty-Five Thousand Dollars (\$25,000.00) per day for each violation of TSCA.

Sincerely,

Donna S. Mullins
Enforcement Officer

DMULLINS:dm:1/25/95:Doyle.lt

6T-PT
Singhvi

FAX TRANSMISSIONFROM

WORLDWIDE RECLAMATION INC
2183 BUCKINGHAM ROAD, STE 266
RICHARDSON, TEXAS, 75081

FAX (214) 329-0054
TEL (214) 329-0052

TO: EPA - Region 6.

655-2164

CONTACT: Ms. Donna Mullins.

THIS FAX TRANSMISSION CONSISTS OF 11 PAGES
INCLUDING THE COVER SHEET.

MESSAGE:

**WORLDWIDE RECLAMATION INC.**

2183 Buckingham Road, Suite 266
Richardson, Texas 75081

USEPA,
Region 6,
1445 Ross Avenue, Ste 1200,
DALLAS, TEXAS, 75202-2733

March 1, 1995

Re : F J Doyle Transformer Salvage Co .

Dear Ms Mullins,

Please find attached a brief outline of the activities which recently took place regarding the above mentioned site. Sampling was performed at seven locations on the site and the laboratory results are attached. The site has changed significantly since the first inspection in 1990, and during our visit several photographs were taken which may be of use in updating you on the site.

Per our brief conversation , I would like to arrange a meeting at your office to go over our findings and discuss the next step in the assessment of this property. I would like to schedule a meeting as soon as possible. My office phone number is (214) 329-0052. I look forward to hearing from you soon,

Yours Sincerely,

Peter Charles

Peter Charles.

F J DOYLE TRANSFORMER SALVAGE CO INC.

SITE VISIT AND SAMPLING

February 15, 1995

PURPOSE

On February 15, 1995 Peter Charles and Timothy Shipley of Worldwide Reclamation Inc, made a site visit to the facility known as F J Doyle Transformer Salvage Co. The visit was made to the site upon the request of Mr F J Doyle after receipt of a violation notice from the EPA, Region 6 dated February 2, 1995.

SITE ACTIVITIES

During the site visit all the paperwork sent to Mr F J Doyle by the EPA was reviewed and a general discussion was conducted regarding his liabilities and the steps to be taken to comply with the discharges discovered in prior EPA tests. As a result of these discussions, it was recommended by Peter Charles to take some surface samples at approximately the same locations as the previous EPA tests to start to define the current situation.

Sampling was initiated using correct procedure to ensure no cross contamination. Upon observation of the general terrain and the visible addition of new fill-dirt all samples were taken from just below surface (1"-3") . The samples all consisted of aged, compacted soils which appeared to have been on-site for a period of time, thus representing the old previously tested soils. Samples were sealed with custody seal and sent to Star Labs, Dallas.

SAMPLE RESULTS.

The samples were tested for PCB as per the chain of custody request and the results follow: All sample results were non-detect. (attached)

SAMPLE LOCATIONS.

The samples were taken from the following locations :

- | | | |
|----------|-----|---|
| Sample 1 | FD1 | Off-site at the NE corner of the property south of FJD property
From the corner, 30 feet to the West, 15 feet to the south. |
| Sample 2 | FD2 | Off-site. From the SW corner of FJD property. 10 feet to the East
and 1 foot from the fence. |
| Sample 3 | FD3 | Off-site. Across the street from the main gate to FJD property, on school
property. From the telephone pole 10 feet south. Directly opposite main
gate. |
| Sample 4 | FD4 | From NE corner of main building. 30 feet north . (35 feet from fence) |
| Sample 5 | FD5 | SE corner of property, 3 feet from corner of fence. |
| Sample 6 | FD6 | From NW corner of building, 35 feet West. |
| Sample 7 | FD7 | Liquid sample from standing water . Drainage ditch at front gate of
property. |

FJ DOYLE TRANSFORMER SALVAGE COMPANY
SITE VISIT
February 15, 1995

CONCLUSION.

The results of the samples taken are not sufficient to qualify nor quantify the extent or existence of contamination at this site. Further testing is required with some samples being taken by boring to below surface @ three feet due to the build-up of fill on the property.

**STAR ANALYTICAL**

14500 Trinity Boulevard, Suite 119 • Fort Worth, Texas 76155
(817) 571-8800 • Metro (817) 540-6982 • FAX (817) 267-5431



Worldwide Reclamation
2163 Buckingham Rd., Ste. 26E
Richardson, TX 75081
Attention: Peter Charles

Client Project ID: F.J. Doyle
Sample Descript: Soil, F.D.-1
Analysis Method: EPA 8080
Lab Number: 502-0709

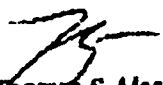
Sampled: Feb 16, 1995
Received: Feb 17, 1995
Extracted: Feb 23, 1995
Analyzed: Feb 25, 1995
Reported: Feb 27, 1995

POLYCHLORINATED BIPHENYLS (EPA 8080)

Analyte	Detection Limit: µg/kg	Sample Results µg/kg
PCB 1018.....	10,000	N.D.
PCB 1221.....	40,000	N.D.
PCB 1232.....	10,000	N.D.
PCB 1242.....	10,000	N.D.
PCB 1248.....	10,000	N.D.
PCB 1254.....	10,000	N.D.
PCB 1260.....	10,000	N.D.

Analytes reported as N.D. were not present above the stated limit of detection. Because matrix effects and/or other factors required additional sample dilution, detection limits for this sample have been raised.

STAR ANALYTICAL


Thomas S. Mascarenas
Laboratory Director

5020706.WWW <1>

000404

**STAR ANALYTICAL**

14500 Trinity Boulevard, Suite 119 • Fort Worth, Texas 76155
(617) 571-8800 • Metro (817) 540-8882 • FAX (817) 287-5431



Worldwide Reclamation
2183 Buckingham Rd., Ste. 266
Richardson, TX 75081
Attention: Peter Charles

Client Project ID: F.J. Doyle
Sample Descript: Soil, F.D.-2
Analysis Method: EPA 8080
Lab Number: 502-0710

Sampled: Feb 16, 1995
Received: Feb 17, 1995
Extracted: Feb 23, 1995
Analyzed: Feb 27, 1995
Reported: Feb 27, 1995

POLYCHLORINATED BIPHENYLS (EPA 8080)

Analyte	Detection Limit µg/kg	Sample Results µg/kg
PCB 1018.....	10,000	N.D.
PCB 1221.....	40,000	N.D.
PCB 1232.....	10,000	N.D.
PCB 1242.....	10,000	N.D.
PCB 1248.....	10,000	N.D.
PCB 1254.....	10,000	N.D.
PCB 1260.....	10,000	N.D.

Analytes reported as N.D. were not present above the stated limit of detection. Because matrix effects and/or other factors required additional sample dilution, detection limits for this sample have been raised.

STAR ANALYTICAL


Thomas S. Mascarenhas
Laboratory Director

5020709.WWW <2>

000405

**STAR ANALYTICAL**

14500 Trinity Boulevard, Suite 119 • Fort Worth, Texas 76155
(817) 571-8800 • Metro (817) 540-6982 • FAX (817) 297-5431



Worldwide Reclamation

2183 Buckingham Rd., Ste. 266

Richardson, TX 75081

Attention: Peter Charles

Client Project ID: F.J. Doyle

Sample Descript: Soil, F.D.-3

Analysis Method: EPA 8080

Lab Number: 502-0711

Sampled: Feb 16, 1995

Received: Feb 17, 1995

Extracted: Feb 23, 1995

Analyzed: Feb 27, 1995

Reported: Feb 27, 1995

POLYCHLORINATED BIPHENYLS (EPA 8080)

Analyte	Detection Limit µg/kg	Sample Results µg/kg
PCB 1018.....	200	N.D.
PCB 1221.....	800	N.D.
PCB 1232.....	200	N.D.
PCB 1242.....	200	N.D.
PCB 1248.....	200	N.D.
PCB 1254.....	200	N.D.
PCB 1260.....	200	N.D.

Analytes reported as N.D. were not present above the stated limit of detection. Because matrix effects and/or other factors required additional sample dilution, detection limits for this sample have been raised.

STAR ANALYTICAL

Thomas S. Mascarenas
Laboratory Director

5020706.WWW <3>

000406

**STAR ANALYTICAL**

14500 Trinity Boulevard, Suite 119 • Fort Worth, Texas 76155
(817) 571-8600 • Metro (817) 540-6982 • FAX (817) 267-5431



Worldwide Reclamation

2183 Buckingham Rd., Ste. 266

Richardson, TX 75081

Attention: Peter Charles

Client Project ID: F.J. Doyle

Sample Descript: Soil, F.D.-4

Analysis Method: EPA 8080

Lab Number: 502-0712

Sampled: Feb 16, 1995

Received: Feb 17, 1995

Extracted: Feb 23, 1995

Analyzed: Feb 27, 1995


Reported: Feb 27, 1995

POLYCHLORINATED BIPHENYLS (EPA 8080)

Analyte	Detection Limit µg/kg	Sample Results µg/kg
PCB 1016.....	200	N.D.
PCB 1221.....	800	N.D.
PCB 1232.....	200	N.D.
PCB 1242.....	200	N.D.
PCB 1248.....	200	N.D.
PCB 1254.....	200	N.D.
PCB 1260.....	200	N.D.

Analytes reported as N.D. were not present above the stated limit of detection. Because matrix effects and/or other factors required additional sample dilution, detection limits for this sample have been raised.

STAR ANALYTICAL


Thomas B. Mascarenas
Laboratory Director

5323709.WWW <4>

000407

**STAR ANALYTICAL**

14500 Trinity Boulevard, Suite 118 • Fort Worth, Texas 76155
(817) 571-8800 • Metro (817) 540-8982 • FAX (817) 267-5431



Worldwide Reclamation

2183 Buckingham Rd., Ste. 266

Richardson, TX 75081

Attention: Peter Charles

Client Project ID: F.J. Doyle

Sample Descript: Soil, F.D.-5

Analysis Method: EPA 8080

Lab Number: 502-0713

Sampled: Feb 16, 1995

Received: Feb 17, 1995

Extracted: Feb 23, 1995

Analyzed: Feb 27, 1995

Reported: Feb 27, 1995

POLYCHLORINATED BIPHENYLS (EPA 8080)

Analyte	Detection Limit µg/kg	Sample Results µg/kg
PCB 1016.....	200	N.D.
PCB 1221.....	800	N.D.
PCB 1232.....	200	N.D.
PCB 1242.....	200	N.D.
PCB 1248.....	200	N.D.
PCB 1254.....	200	N.D.
PCB 1260.....	200	N.D.

Analytes reported as N.D. were not present above the stated limit of detection. Because matrix effects and/or other factors required additional sample dilution, detection limits for this sample have been raised.

STAR ANALYTICAL

Thomas S. Mascarenas
Laboratory Director

5020709.WWW <5>

000408

**STAR ANALYTICAL**

14500 Trinity Boulevard, Suite 119 • Fort Worth, Texas 76155
(817) 571-6800 • Metro (817) 540-8982 • FAX (817) 267-5431



Worldwide Reclamation

2183 Buckingham Rd., Ste. 266

Richardson, TX 75081

Attention: Peter Charles

Client Project ID: F.J. Doyle

Sample Descript: Soil, F.D.-6

Analysis Method: EPA 8080

Lab Number: 502-0714

Sampled: Feb 18, 1995

Received: Feb 17, 1995

Extracted: Feb 23, 1995

Analyzed: Feb 27, 1995

Reported: Feb 27, 1995

POLYCHLORINATED BIPHENYLS (EPA 8080)

Analyte	Detection Limit µg/kg	Sample Results µg/kg
PCB 1018.....	200	N.D.
PCB 1221.....	800	N.D.
PCB 1232.....	200	N.D.
PCB 1242.....	200	N.D.
PCB 1248.....	200	N.D.
PCB 1254.....	200	N.D.
PCB 1260.....	200	N.D.

Analytes reported as N.D. were not present above the stated limit of detection. Because matrix effects and/or other factors required additional sample dilution, detection limits for this sample have been raised.

STAR ANALYTICAL

Thomas S. Mascareñas
Laboratory Director

6020700.WWW <8>

000409

**STAR ANALYTICAL**

14500 Trinity Boulevard, Suite 119 • Fort Worth, Texas 76155
(817) 571-6800 • Metro (817) 540-0952 • FAX (817) 267-5431



Worldwide Reclamation

2183 Buckingham Rd., Ste. 266

Richardson, TX 75081

Attention: Peter Charles

Client Project ID: F.J. Doyle

Sample Descript: Liquid, F.D.-7

Analysis Method: EPA 8080

Lab Number: 502-0716

Sampled: Feb 16, 1995

Received: Feb 17, 1995

Extracted: Feb 24, 1995

Analyzed: Feb 27, 1995

Reported: Feb 27, 1995

POLYCHLORINATED BIPHENYLS (EPA 8080)

Analyte	Detection Limit µg/L	Sample Results µg/L
PCB 1016.....	0.50	N.D.
PCB 1221.....	2.0	N.D.
PCB 1232.....	0.50	N.D.
PCB 1242.....	0.50	N.D.
PCB 1248.....	0.50	N.D.
PCB 1254.....	0.50	N.D.
PCB 1260.....	0.50	N.D.

Analytes reported as N.D. were not present above the stated limit of detection.

STAR ANALYTICAL


Thomas S. Mascarenas
Laboratory Director

000410

APPENDIX G-1

WORLDWIDE RECLAMATION INC,
2183 BUCKINGHAM RD, STE 266,
RICHARDSON, TEXAS,
75081

USEPA,
Region 6,
1445 Ross Avenue, Ste 1200,
DALLAS, TEXAS, 75202-2733

June 15, 1995

Re : F J Doyle Transformer Salvage Co .

Dear Ms Mullins,

On May 23, 1995 the above mentioned site was sampled by personnel of Worldwide Reclamation Inc, by means of grid sampling of the soil for PCB composite testing. The laboratory results of the sampling are attached along with the grid design and sample distribution for grid compositing.

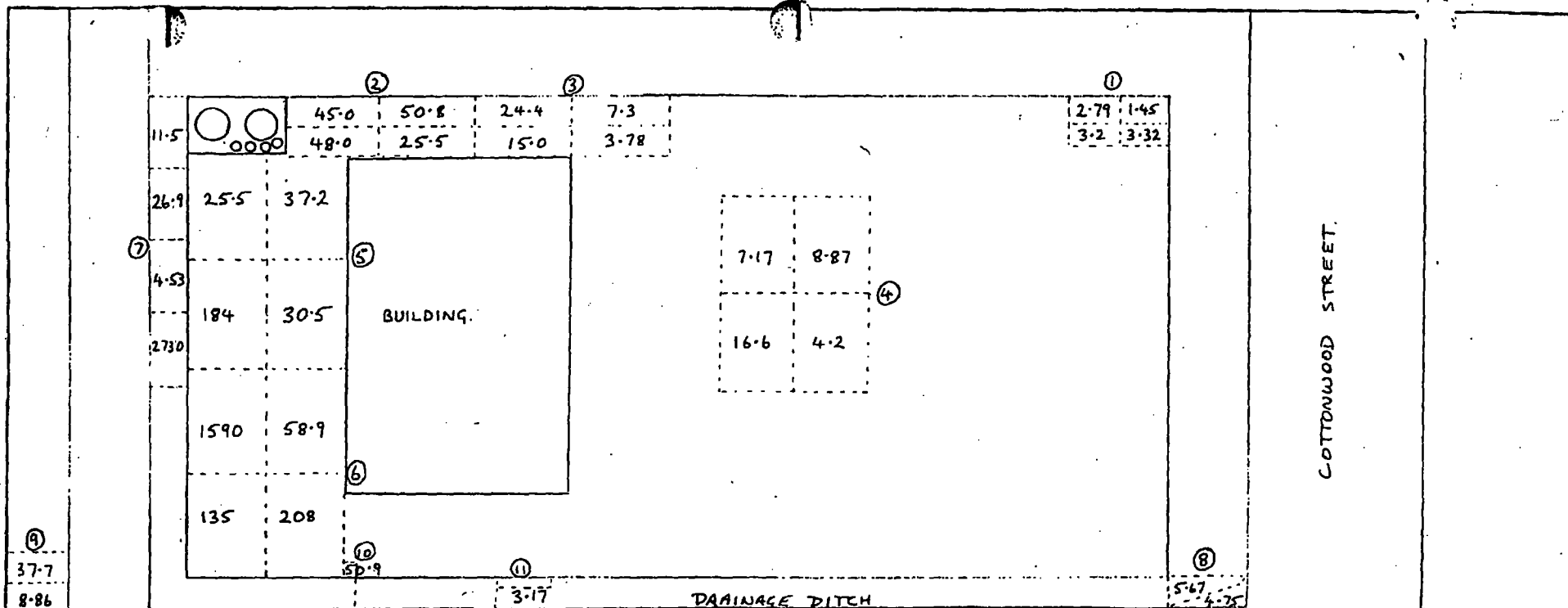
As can be seen from the results of the sampling, PCB's are present on-site at numerous locations. With these results, there is an immediate need to set-up a remedial action plan to facilitate the clean-up of the site.

I will contact you as soon as possible to organize a meeting to discuss the next step,

Yours Sincerely,

Peter Charles

Peter Charles.



F.J. DOYLE SALVAGE TRANSFORMER			
PCB LEVELS FROM PHASE 1 TESTING.			
SCALE	1" = 20 FT	APPROVED BY	DRAWN BY TS
DATE			REVISED
KEY	①	GRID NUMBER	
	1...2...3	PCB RESULTS IN PPM	
			DRAWING NUMBER
			51340-F.J

APPENDIX G-5

Record of

Communication

☐ phone call ☐ discussion ☐ field trip ☐ conference

☐ other (specify)

Record of Item Checked Above

To:
The File

From:
Donna Mullins

Date: 6/22/95

Time: 1300 hours

Subject: Frank Doyle Site, Leonard, Texas

Summary of Communication

On the above date I met with Chris Petersen, Removal/Sites Section Chief and Ken Clark, On-Scene Coordinator to discuss the possible referral of the Frank Doyle Site, Leonard, Texas to their Section. I gave them a background summary of the site and explained to them that we had requested that Mr. Doyle remediate the site. I told them that I had given Mr. Doyle until 6/27/95 to give me an answer and that I fully anticipated that he would not have the financial capability to do so. I also explained to them that there residences, one of which is a daycare and a high school in the direct proximity of the site. I told them that I believed for a number of reasons that the site should be cleaned up before school starts, which would be in August.

Conclusions, Action Taken or Required

This site will be referred to Superfund, Emergency Response Branch if Mr. Doyle declines to conduct the cleanup.

Information Copies To:

EPA Form 1300-6

JUN 27 1995

MEMORANDUM

SUBJECT: Referral of Frank J. Doyle Site, Leonard, Texas

FROM: Carol D. Peters
Section Chief
Toxics Section (6T-PT)

TO: Chris Petersen
Section Chief
Removal/Sites Section (6E-ES)

As you are aware based on the June 22, 1995 meeting between Donna Mullins, of my staff, and you and your staff, we have been investigating the Frank J. Doyle Site in Leonard, Texas. Based on recent PCB sampling of the site, it has been determined that PCB contamination exists both on and off-site. Within direct proximity to the site are residences, one of which serves as a daycare, and a public high school. Based on a meeting and phone conversation with Mr. Doyle, he doesn't have the financial capability for remediation of the site.

Therefore, we are referring this case to your office for your consideration. A chronology of the site activities is enclosed, as well as a copy of our file, for your convenience. If you have any questions concerning this matter, please call Donna Mullins at X7576.

Attachments

D.L.
DMULLINS:dm:6/26/95:Doyle.rf

6T-PT
Singhvi

D.L. for
6/27/95

ENFORCEMENT SENSITIVE
COMPLIANCE EVALUATION FORM

LOG NO.-TX-94-2234
& TX-91-002
DUNS NO.-TXD980865109
DOCKET NO.-

COMPANY NAME: Frank J. Doyle & Sons

FACILITY ADDRESS: P.O. Box 312
305 Cottonwood Street
Leonard, Texas 75452

NATURE OF BUSINESS: Scrap and metal Salvage

PLANT REPRESENTATIVE/TITLE: Frank J. Doyle, Owner

STATE OF INCORPORATION: Not incorporated

REGISTERED AGENT FOR SERVICE OF PROCESS: (INCLUDE TITLE, ADDRESS)
None

DATE OF INSPECTION: 10/12/90 & 9/7/94

INSPECTOR: Dick McLaughlin & Lupe Pesina

NOTICE OF INSPECTION GIVEN OUT AND TO WHOM (INCLUDE TITLE):
Frank J. Doyle, Owner and Garry Doyle, Co-Owner

SAMPLES TAKEN: No ☐ Yes ☒ How many 22 & 4

CHAIN OF CUSTODY FOR SAMPLE RESULTS: No ☐ Yes ☒

ACT: TSCA

NARRATIVE:

CHRONOLOGY OF F. S. DOYLE & SONS TRANSFORMERS

- A PCB Inspection was conducted on 8/30/83. At the time of the inspection, the facility had 150 transformers, 100 empty casings transformer parts and 1-500 gallon and 1-900 gallon storage tanks. No PCB records of transactions were kept. Five samples were

and two samples (b) (6) residence and school yard) were collected for dioxin analysis. Offsite wipe samples were collected at the Doyle residence, (b) (6) residence, and at the school building for dioxin analysis.

All samples analyzed for dioxin were non detect. Three sample sites contained PCBs greater than 50 ppm. Those were the Salvage Yard- North grid (89 ppm), Salvage Yard- South Grid (71 ppm) and the drainage pathway south of the site (280 ppm).

It was determined during this inspection that Mr. Doyle bought used transformers from only four sources, which were Southwestern Electric Power Co. (SWEPCO), City of Garland, Texas, Louisiana Power & Light and Public Service of Oklahoma. He had a heat cleaning oven for drying and removing transformer core residue to simplify removal of copper. The oven had a Texas Air Control Board permit. All of the scrap metal was sold to McKinney Metals. All transformer oil was sold to Scoggins Oil Co., Sallisaw, Okla.

- On 7/26/90 a PCB Inspection was conducted at McKinney Metals, McKinney, Texas. Based on the inspection findings, it was determined that Frank Doyle is the primary supplier of transformer cans and burned windings. Frank Doyle did not supply certifications or test results with this equipment. A sample was taken at the prepared ferrous and shearing area, where earlier that day several empty transformer cans had arrived from Frank Doyle. This sample contained 86.3 ppm PCB.

- On April 19, 1991 the TAT went back to the site to collect further samples from the drainage ditch. Four composite and one grab sample was taken for PCB analysis. Three of the samples contained PCBs in excess of 50 ppm (58 ppm, 271 ppm and 166 ppm). The ERB referred this case back to TSCA in July, 1991.

- On September 7, 1994 a PCB Inspection was conducted at the facility. At the time of the inspection, the facility had 11 drums of brass material, 91 drums of scrap metal, 751 empty transformers and 3 oil storage tanks (2-500 gallon and 1-275 gallon) at the facility. The transformers are now mainly purchased from Louisiana Power & Light and SWEPCO. The oil is still sold to John Scoggins and the scrap metal is sold to McKinney Metals. Four samples were taken during the inspection for PCB analysis. One soil sample taken from outside the fence in a drainage pathway between the fence and the road across the street from the school contained 11.8 ppm PCB.

Adjustments to Gravity Based Penalty - None applicable at this time.

Proposed penalty for Count I: \$ 5,000.00*

* Only 1 day of disposal will be charged as of the date of this evaluation, because it is not known or believed that the analytical results have ever been provided to Mr. Doyle.

2. MITIGATING FACTORS/POTENTIAL DEFENSES: It is expected that Mr. Doyle will claim that he has never taken PCB oil in excess of 50ppm. However, he has not kept records of all the equipment he has received nor required sample analysis results.

3. AGGRAVATING FACTORS:

4. ANY SIGNIFICANT NATIONAL OR PRECEDENTIAL FACTUAL OR LEGAL ISSUES: None known.

5. POLICY OR GUIDANCE DOCUMENTS RELATED TO VIOLATION (ATTACH COPY): N/A

6. INJUNCTIVE RELIEF NECESSARY: Not at this time.

7. ENVIRONMENTAL CONSEQUENCES: Improper disposal of PCBs to the environment, both onsite and offsite. The contamination offsite is in close proximity to a school.

8. PENDING REGULATORY CHANGES: On December 6, 1994 a proposed draft amendment to the PCB Regulations was published. The draft disposal regulations proposed will allow for additional disposal options. However, these regulations are only draft at this time.

9. RECENT CONTACTS WITH COMPANY BY EPA (OTHER THAN INSPECTION): None

10. CONTACTS WITH COMPANY BY STATE, LOCAL AGENCIES, CITIZENS, AND ACTIONS TAKEN: None

11. CONTACTS WITH STATE BY EPA (ACTIONS TAKEN, INFORMATION REQUESTED): None

12. ADDITIONAL INFORMATION NEEDED (SUBPOENA, INSPECTION, ETC.): A letter will be sent to Mr. Doyle requesting further characterization of the problem, and if appropriate, remediation. This letter will be sent to first, make Mr. Doyle aware of the problem and, second, to solicit Mr. Doyle's intentions on this matter.

APPENDIX G-6

CERCLIS# TXD980865109

**SITE ASSESSMENT REPORT
FOR
DOYLE TRANSFORMER SALVAGE
LEONARD, FANNIN COUNTY, TEXAS**

August 31, 1995

Prepared for:

**J. Chris Petersen
Deputy Project Officer
Response and Prevention Branch
EPA Region 6**

Contract Number: 68-WO-0037



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International Specialists in the Environment

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International Specialists in the Environment

1999 Bryan Street
Dallas, Texas 75201
Tel: (214) 220-0318, Fax: (214) 855-1422

CERCLIS# TXD980865109

Date: August 31, 1995

To: Kenneth Clark, OSC
EPA Region 6, Response and Prevention Branch

Thru: Chris Petersen, DPO
EPA Region 6, Response and Prevention Branch

Thru: Chris Quina, TATL
Region 6 Technical Assistance Team

From : Melissa Stallings
Region 6 Technical Assistance Team

Subj: Site Assessment Report: Doyle Transformer Salvage Site
Leonard, Fannin County, Texas
TDD#: T06-9507-002
PAN: ETX1204SCA
LAT 33° 23' 23" N LONG 96° 14' 34" W

I. INTRODUCTION

On July 10, 1995 the Technical Assistance Team (TAT) was tasked by the Region 6 United States Environmental Protection Agency (EPA) Response and Prevention Branch (RPB) to conduct site investigation activities at the Doyle Transformer Salvage site in Leonard, Fannin County, Texas. Within the scope of the Technical Direction Document (TDD) and under the direction of the EPA, the TAT was tasked by the On-Scene Coordinator (OSC) to assist the OSC in obtaining property access, develop a Quality Assurance Sampling Plan (QASP) and conduct PCB soil sampling.

II. BACKGROUND

The Doyle Transformer site comprises approximately 0.6 acre and is located in Leonard, Fannin County, Texas at 305 Cottonwood Street (Attachment A). The nearest residential area is located adjacent to the facility. The predominant land use in the immediate vicinity of the site is residential; however, there is a day-care facility (Project L.I.F.E.) adjacent to the south side of

the facility and Leonard High School directly across the street on the east side of the facility. A map template with accuracy to one second was used with the Leonard Texas USGS 7.5 minute quadrangle to determine site coordinates of 33° 23' 23" North latitude and 96° 14' 34" West longitude.

Doyle Transformer Salvage is currently active and has been in operation since approximately 1974. In the past, Mr. Frank Doyle obtained transformers from companies in Texas, Oklahoma, Louisiana and Arkansas. Salvage operations involve recovering oil, wiring and scrap metal from the transformers. Mr. Frank Doyle has used the oil in the past for weed control and has distributed the oil to various individuals for use as a weed killer. Past site inspections include a Site Assessment sampling investigation conducted by the E & E TAT on October 12, 1990 and April 19, 1991 and two EPA PCB inspections conducted on July 20, 1990 and September 7, 1994. Under the supervision of the EPA, Mr. Doyle's contractor, Worldwide Reclamation, conducted surface and subsurface soil sampling at the facility on May 23 - 24, 1995.

III. ACTIONS TAKEN

On July 10, 1995 TAT members Melissa Stallings and Anan Hammad and EPA OSC Rita Engblom conducted a site visit to obtain site access and determine soil sampling locations. The TAT prepared and submitted a QASP (Attachment E) on July 11, 1995. On July 12, 1995, TAT members Melissa Stallings, Anan Hammad, Kristine Lloyd and William Gamblin mobilized to the site to implement the QASP. The TAT also assisted OSC Kenneth Clark in obtaining access agreements for the sampling inspection (Attachment G).

The TAT utilized a geoprobe soil probe and slam bar soil probes to collect 68 surface and subsurface soil samples. The samples were collected from 24 locations outside the facility on the west, south and east sides (Attachment C) to determine the presence and extent of PCB contamination for removal action determination. Six sample locations were in the center of the city-owned alley on the south side of the facility. At these locations and at the sample location on the east side of the facility, samples were collected at six-inch intervals from the surface to a depth of 24 inches. Samples were collected from seventeen sample locations in the adjacent residential area, including six sample locations in a day-care facility. At each location, samples were collected at six-inch intervals from the surface to a depth of 12 inches.

The TAT shipped the samples to the EPA Houston Laboratory for PCB analysis (Attachment H). The analytical results (Attachments D and K) revealed PCB (Aroclor 1260) concentrations greater than 10 parts per million (ppm) in 11 of the 68 samples and PCB concentrations greater than 1 ppm, but less than 10 ppm, in 14 of the 68 samples. All samples from the day-care facility were below the detection limit of 1 ppm PCB.

Future site activity, if necessary, will be determined by the EPA upon completion of data review.

Attachments

- A. Site Location Map
- B. OSCARS Summary Map
- C. Sample Location Map
- D. Sample Results Map
- E. Quality Assurance Sampling Plan
- F. Copy of Logbook
- G. Access Agreements
- H. Chain of Custody forms and FEDEX airbill
- I. EPA Houston Laboratory Analytical Results (under separate cover)
- J. Photographs (Negatives in TAT file)
- K. Site Assessment Sampling Results
- L. Environmental Justice Report
- M. Copy of TDD# T06-9507-002 and Amendment A

ENVIRONMENTAL PROTECTION AGENCY
Region 6

OFFICIAL
CHAIN OF CUSTODY RECORD

REGION 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

PROJ. NO.		PROJECT NAME				NO. OF CON- TAINERS	REMARKS									
TAC 1-12-95 119		DYKE TRANSFORMER Siding														
SAMPLERS: (Signature)		1/12/95 119				2 WEEK TURNAROUND PER OSC KENNETH CLARK										
STA. NO.	DATE	TIME	COMP.	GRAB	STATION LOCATION	PCB	TAC #									
AC6-12	1-12	1500		X	ALLEY 12-18 INCHES	1	X									6-059487
DC5-12	1-12	1300		X	DAYCARE 6-12 INCHES	1	X									6-059483
AC6-6	1-12	1500		X	ALLEY 6-12 INCHES	1	X									6-059486
DC6-6	1-12	1310		X	DAYCARE 6-12 INCHES	1	X									6-059484
AC6-18	1-12	1500		X	ALLEY 12-18 INCHES	1	X									6-059488
AC6-24	1-12	1500		X	ALLEY 18-24 INCHES	1	X									6-059489
DC5-6	1-12	1300		X	DAYCARE 6-12 INCHES	1	X									6-059482
DC6-12	1-12	1310		X	DAYCARE 6-12 INCHES	1	X									6-059485
DC3-6	1-12	1315		X	DAYCARE 6-12 INCHES	1	X									6-059478
DC4-12	1-12	1240		X	DAYCARE 6-12 INCHES	1	X									6-059481
DC4-6	1-12	1240		X	DAYCARE 6-12 INCHES	1	X									6-059480
DL1-11	1-12	1235		X	DAYCARE 0-6 INCHES	1	X									6-059476
DL1-12	1-12	1235		X	DAYCARE 6-12 INCHES	1	X									6-059477
DO3-12	1-12	1315		X	DAYCARE 6-12 INCHES	1	X									6-059479
	1-12	1315		X	DAYCARE 6-12 INCHES	1	X									
Relinquished by: (Signature)		Date / Time		Received by: (Signature)		Relinquished by: (Signature)		Date / Time		Received by: (Signature)						
1/12/95		2100		FEDERAL EXPRESS												
Relinquished by: (Signature)		Date / Time		Received by: (Signature)		Relinquished by: (Signature)		Date / Time		Received by: (Signature)						
Relinquished by: (Signature)		Date / Time		Received for Laboratory by: (Signature)		Date / Time		Remarks								
0042								COOLER # 2 OF 2								
Shipped by: ECOLOGY & ENVIRONMENT, INC				Airbill Number: 536530 3543				AIRBILL #								

Distribution: White Accompanies Shipment; Pink to Coordinator Field Files;
Green to Report; Yellow Returns with Warrant

PROJECT
LIFE
DAYCARE

SHED

D06

D03

SAND
BOX

D05

D02

D04

D01

R06

R03

(b) (6)

HOUSE

R05

R02

R04

R01

R10

R11

ALLEY

GARAGE

CONCRETE
DRUM
STORAGE

GATE

TRANSFORMER
STORAGE AREA

F01

R07

R08

BLDG

DOYLE TRANSFORMER
SALVAGE

CONCRETE D

GATE

POPLAR

DOYLE TRANSFORMER SALVAGE
SITE ASSESSMENT SAMPLING RESULTS
7-12-95

TAT STATION LOCATION	EPA SAMPLE NO.	STATION DESCRIPTION	DEPTH IN INCHES	PCB (1260) PPM
F01-06	5TFAKC0264	OUTSIDE FACILITY, 6 FT E OF E. FENCE, 15 FT N OF S. FENCE	0 - 6	2.98
F01-12	5TFAKC0265	OUTSIDE FACILITY, 6 FT E OF E. FENCE, 15 FT N OF S. FENCE	6 - 12	14.00
F01-18	5TFAKC0266	OUTSIDE FACILITY, 6 FT E OF E. FENCE, 15 FT N OF S. FENCE	12 - 18	4.81
F01-24	5TFAKC0267	OUTSIDE FACILITY, 6 FT E OF E. FENCE, 15 FT N OF S. FENCE	18 - 24	ND
F01-24D	5TFAKC0268	OUTSIDE FACILITY, 6 FT E OF E. FENCE, 15 FT N OF S. FENCE	18 - 24	ND
A01-06	5TFAKC0260	ALLEY, 12.5 FT WEST OF FACILITY EAST FENCE	0 - 6	5.70
A01-12	5TFAKC0261	ALLEY, 12.5 FT WEST OF FACILITY EAST FENCE	6 - 12	74.60
A01-18	5TFAKC0262	ALLEY, 12.5 FT WEST OF FACILITY EAST FENCE	12 - 18	48.20
A01-24	5TFAKC0263	ALLEY, 12.5 FT WEST OF FACILITY EAST FENCE	18 - 24	ND
A02-06	5TFAKC0255	ALLEY, 25 FT WEST OF A01	0 - 6	1.57
A02-12	5TFAKC0256	ALLEY, 25 FT WEST OF A01	6 - 12	852.00
A02-18	5TFAKC0257	ALLEY, 25 FT WEST OF A01	12 - 18	22.00
A02-24	5TFAKC0258	ALLEY, 25 FT WEST OF A01	18 - 24	115.00
A02-24D	5TFAKC0259	ALLEY, 25 FT WEST OF A01	18 - 24	32.60
A03-06	5TFAKC0251	ALLEY, 25 FT WEST OF A02	0 - 6	ND
A03-12	5TFAKC0252	ALLEY, 25 FT WEST OF A02	6 - 12	59.00
A03-18	5TFAKC0253	ALLEY, 25 FT WEST OF A02	12 - 18	ND
A03-24	5TFAKC0254	ALLEY, 25 FT WEST OF A02	18 - 24	ND

ND = NOT DETECTED, DETECTION LIMIT < .1 PPM

DOYLE TRANSFORMER SALVAGE
SITE ASSESSMENT SAMPLING RESULTS (con't)
7-12-95

TAT STATION LOCATION	EPA SAMPLE NO.	STATION DESCRIPTION	DEPTH IN INCHES	PCB (1260) PPM
A04-06	5TFAKC0224	ALLEY, 25 FT WEST OF A03	0 - 6	ND
A04-12	5TFAKC0216	ALLEY, 25 FT WEST OF A03	6 - 12	8.54
A04-18	5TFAKC0219	ALLEY, 25 FT WEST OF A03	12 - 18	ND
A04-24	5TFAKC0222	ALLEY, 25 FT WEST OF A03	18 - 24	ND
A04-24D	5TFAKC0223	ALLEY, 25 FT WEST OF A03	18 - 24	ND
A05-06	5TFAKC0217	ALLEY, 25 FT WEST OF A04	0 - 6	2.31
A05-12	5TFAKC0213	ALLEY, 25 FT WEST OF A04	6 - 12	ND
A05-18	5TFAKC0212	ALLEY, 25 FT WEST OF A04	12 - 18	ND
A05-24	5TFAKC0214	ALLEY, 25 FT WEST OF A04	18 - 24	ND
A06-06	5TFAKC0239	ALLEY, 25 FT WEST OF A05	0 - 6	ND
A06-12	5TFAKC0237	ALLEY, 25 FT WEST OF A05	6 - 12	7.35
A06-18	5TFAKC0241	ALLEY, 25 FT WEST OF A05	12 - 18	ND
A06-24	5TFAKC0242	ALLEY, 25 FT WEST OF A05	18 - 24	ND
D01-06	5TFAKC0248	PROJECT L.I.F.E. DAY-CARE, 2 FT S OF NORTH FENCE. 9 FT W OF EAST FENCE	0 - 6	ND
D01-12	5TFAKC0249	PROJECT L.I.F.E. DAY-CARE, 2 FT S OF NORTH FENCE. 9 FT W OF EAST FENCE	6 - 12	ND
D02-06	5TFAKC0221	PROJECT L.I.F.E. DAY-CARE, 2 FT S OF NORTH FENCE. 29 FT W OF EAST FENCE	0 - 6	ND
D02-12	5TFAKC0218	PROJECT L.I.F.E. DAY-CARE, 2 FT S OF NORTH FENCE. 29 FT W OF EAST FENCE	6 - 12	ND
D02-12D	5TFAKC0220	PROJECT L.I.F.E. DAY-CARE, 2 FT S OF NORTH FENCE. 29 FT W OF EAST FENCE	6 - 12	ND

ND = NOT DETECTED, DETECTION LIMIT < 1 PPM

DOYLE TRANSFORMER SALVAGE
SITE ASSESSMENT SAMPLING RESULTS (con't)
7-12-95

TAT STATION LOCATION	EPA SAMPLE NO.	STATION DESCRIPTION	DEPTH IN INCHES	PCB (1260) PPM
D03-06	5TFAKC0245	PROJECT L.I.F.E. DAY-CARE, 2 FT S OF NORTH FENCE, 49 FT W OF EAST FENCE	0 - 6	ND
D03-12	5TFAKC0250	PROJECT L.I.F.E. DAY-CARE, 2 FT S OF NORTH FENCE, 49 FT W OF EAST FENCE	6 - 12	ND
D04-06	5TFAKC0247	PROJECT L.I.F.E. DAY-CARE, 15 FT S OF NORTH FENCE, 9 FT W OF EAST FENCE	0 - 6	ND
D04-12	5TFAKC0246	PROJECT L.I.F.E. DAY-CARE, 15 FT S OF NORTH FENCE, 9 FT W OF EAST FENCE	6 - 12	ND
D05-06	5TFAKC0243	PROJECT L.I.F.E. DAY-CARE, 15 FT S OF NORTH FENCE, 29 FT W OF EAST FENCE	0 - 6	ND
D05-12	5TFAKC0238	PROJECT L.I.F.E. DAY-CARE, 15 FT S OF NORTH FENCE, 29 FT W OF EAST FENCE	6 - 12	ND
D06-06	5TFAKC0240	PROJECT L.I.F.E. DAY-CARE, 15 FT S OF NORTH FENCE, 49 FT W OF EAST FENCE	0 - 6	ND
D06-12	5TFAKC0244	PROJECT L.I.F.E. DAY-CARE, 15 FT S OF NORTH FENCE, 49 FT W OF EAST FENCE	6 - 12	ND
R01-06	5TFAKC0234	(b) (6) 14 FT N AND 3.5 FT E OF HOUSE	0 - 6	27.9
R01-12	5TFAKC0233	(b) (6) 14 FT N AND 3.5 FT E OF HOUSE	6 - 12	ND
R02-06	5TFAKC0229	(b) (6) 14 FT N OF HOUSE, 22 FT W OF R01	0 - 6	3.75
R02-12	5TFAKC0230	(b) (6) 14 FT N OF HOUSE, 22 FT W OF R01	6 - 12	ND

ND = NOT DETECTED, DETECTION LIMIT < 1 PPM

DOYLE TRANSFORMER SALVAGE
SITE ASSESSMENT SAMPLING RESULTS (con't)
7-12-95

TAT STATION LOCATION	EPA SAMPLE NO.	STATION DESCRIPTION	DEPTH IN INCHES	PCB (1260) PPM
R02-12D	5TFAKC0226	(b) (6) 14 FT N OF HOUSE, 22 FT W OF R01	6 - 12	ND
R03-06	5TFAKC0210	(b) (6) 14 FT N OF HOUSE, 22 FT W OF R02	0 - 6	4.07
R03-12	5TFAKC0236	(b) (6) 14 FT N OF HOUSE, 22 FT W OF R02	6 - 12	ND
R04-06	5TFAKC0235	(b) (6) 7 FT N AND 3.5 FT E OF HOUSE	0 - 6	3.62
R04-12	5TFAKC0227	(b) (6) 7 FT N AND 3.5 FT E OF HOUSE	6 - 12	ND
R05-06	5TFAKC0215	(b) (6) 7 FT N OF HOUSE, 22 FT W OF R04	0 - 6	1.12
R05-12	5TFAKC0211	(b) (6) 7 FT N OF HOUSE, 22 FT W OF R04	6 - 12	ND
R06-06	5TFAKC0201	(b) (6) 7 FT N OF HOUSE, 22 FT W OF R05	0 - 6	ND
R06-12	5TFAKC0202	(b) (6) 7 FT N OF HOUSE, 22 FT W OF R05	6 - 12	ND
R07-06	5TFAKC0203	DOYLE RESIDENCE, 7 FT W OF FACILITY W. FENCE, 19 FT N OF EAST GARAGE	0 - 6	10.40
R07-12	5TFAKC0205	DOYLE RESIDENCE, 7 FT W OF FACILITY W. FENCE, 19 FT N OF EAST GARAGE	6 - 12	2.19
R07-12D	5TFAKC0204	DOYLE RESIDENCE, 7 FT W OF FACILITY W. FENCE, 19 FT N OF EAST GARAGE	6 - 12	ND

ND = NOT DETECTED, DETECTION LIMIT < 1 PPM

DOYLE TRANSFORMER SALVAGE
SITE ASSESSMENT SAMPLING RESULTS (con't)
7-12-95

TAT STATION LOCATION	EPA SAMPLE NO.	STATION DESCRIPTION	DEPTH IN INCHES	PCB (1260) PPM
R08-06	5TFAKC0206	DOYLE RESIDENCE, 7 FT W OF FACILITY W. FENCE, 43 FT N OF EAST GARAGE	0 - 6	6.97
R08-12	5TFAKC0207	DOYLE RESIDENCE, 7 FT W OF FACILITY W. FENCE, 43 FT N OF EAST GARAGE	6 - 12	ND
R09-06	5TFAKC0208	DOYLE RESIDENCE, 24 FT W OF FACILITY W. FENCE, 31 FT N OF EAST GARAGE	0 - 6	2.00
R09-12	5TFAKC0209	DOYLE RESIDENCE, 24 FT W OF FACILITY W. FENCE, 31 FT N OF EAST GARAGE	6 - 12	ND
R10-06	5TFAKC0228	(b) (6) 25 FT E OF HOUSE, 7 FT S OF N SIDE OF HOUSE	0 - 6	ND
R10-12	5TFAKC0225	(b) (6) 25 FT E OF HOUSE, 7 FT S OF N SIDE OF HOUSE	6 - 12	ND
R11-06	5TFAKC0231	(b) (6) 20 FT E OF R01, 20 FT N OF R10	0 - 6	13.60
R11-12	5TFAKC0232	(b) (6) 20 FT E OF R01, 20 FT N OF R10	6 - 12	ND

ND = NOT DETECTED, DETECTION LIMIT < 1 PPM

Record of Communication	<input type="checkbox"/> phone call <input type="checkbox"/> discussion <input type="checkbox"/> field trip <input type="checkbox"/> conferen <input type="checkbox"/> other (specify)		
	Record of Item Checked Above		
To: The File	From: Donna Mullins, EPA	Date: 6/21/95	
		Time: 1300 hours	
Subject: Site Visit to Frank Doyle Facility, Leonard, Texas			

Summary of Communication

On June 21, 1995 I went to the Frank Doyle site to discuss the sample results from the May 23-24, 1995 sampling effort at the Frank Doyle site. Based on this sampling effort, PCB contamination was identified both on and off the site. The purpose of this visit was to inform Mr. Doyle that the contamination exists and request that he initiate a cleanup as soon as possible. Present at the meeting were Mr. Frank Doyle, Gary Doyle, Mr. Doyle's Son-In-Law, Peter Charles, Worldwide Reclamation and myself. Based on the May 23-24, 1995 sampling results Mr. Doyle's contractor, Worldwide Reclamation, put together a minimum cost analysis of \$261, 400.00 to cleanup the site. Mr. Doyle said that he didn't have the money for the cleanup but he needed a week to check all his options. He further asked what would happen if he didn't conduct the cleanup. I explained to him that I was working under the jurisdiction of the Toxic Substances Control Act (TSCA), which requires that the owner/operator of the site clean it up. I further explained that the thrust of TSCA is an administrative penalty, which could potentially penalize his business for improper disposal on a per day basis. I told him that the Agency is more interested in getting a cleanup, than collecting penalties. I told him that if he couldn't conduct the cleanup, this case would be referred to the Superfund, Emergency Response Program for their consideration on cleanup. I described in general terms how the Superfund, Emergency Response Program works. I told him that a request for cleanup would probably be made on him and potentially his past customers. If no one accepted responsibility for the cleanup, Superfund could cleanup the site themselves, provided it met their criteria, and seek to recover cleanup costs later. I told him that I wasn't sure how far Superfund went to recoup cleanup costs, i.e. personal assets. I gave Mr. Doyle until 6/28/95 to decide upon this matter before I referred it to Superfund.

Mr. Doyle gave additional information about the operation of this site. He has been junking transformers at the site since approximately 1974. From the time he started operating at the site until date unknown, Mr. Doyle did not require lab analysis of the oil content. Based on the ERI August 30, 1983 PCB Inspection, Mr. Doyle had oil in excess of 50 ppm PCB stored at this site. He said that he had acquired some transformers from the Floydada Lighthouse Electric Cooperative, Floydada, Texas that were stored in the area on the south side of the site where PCB contamination has been identified. He also stated that he has sprayed the site on various occasions with transformer oil to kill the weeds. He has also given the oil to various sources over the years for killing weeds, etc.

Conclusions, Action Taken or Required

In conclusion, I told Mr. Doyle that I would call him on the morning of June 27, 1995 to acquire as to whether he will accept responsibility for the cleanup of the site. I also told him that I would send him the complete copy of the file.

Information Copies To:

EPA Form 1300-6

CERTIFICATE OF INTEREST

APPENDIX II



SCOTTSDALE INSURANCE COMPANY*

**COMMERCIAL GENERAL LIABILITY COVERAGE PART
SUPPLEMENTAL DECLARATIONS**Policy No. CLS 485624 Effective Date: 08/09/1997

12:01 A.M., Standard Time

Named Insured F.J. DOYLE DBA Agent No. 42002

Item 1. Business Description: SCRAP METAL DEALER		
Item 2. Limits of Insurance		
Coverage	Limit of Liability	
Aggregate Limits of Liability	\$ <u>500,000</u>	Products/Completed Operations Aggregate
	\$ <u>500,000</u>	General Aggregate (other than Products/Completed Operations)
Coverage A - Bodily Injury and Property Damage Liability	\$ <u>500,000</u>	any one occurrence subject to the Products/Completed Operations and General Aggregate Limits of Liability
	\$ <u>EXCLUDED</u>	any one fire subject to the Coverage A occurrence and the General Aggregate Limits of Liability
Fire Damage Liability	\$ <u>EXCLUDED</u>	
Coverage B - Personal and Advertising Injury Liability	\$ <u>EXCLUDED</u>	any one person or organization subject to the General Aggregate Limits of Liability
Coverage C - Medical Payments	\$ <u>EXCLUDED</u>	any one person subject to the Coverage A occurrence and the General Aggregate Limits of Liability
Item 3. Retroactive Date		
Coverage A of this Insurance does not apply to "bodily injury" or "property damage" which occurs before the Retroactive Date, if any, shown here: <u>NONE</u> <small>(Enter Date or "None" if no Retroactive Date applies)</small>		
Item 4. Form of Business and Location of Premises		
Form of Business: <input checked="" type="checkbox"/> Individual <input type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> Organization (other than Partnership or Corporation)		
Location of All Premises You Own, Rent or Occupy: 305 EAST COTTONWOOD ST., LEONARD, TX 77452		
Item 5. Forms and Endorsements		
Form(s) and Endorsement(s) made a part of this policy at time of issue: See Schedule of Forms and Endorsements		
Item 6. Premiums		
Coverage Part Premium:	\$	1,188
Other Premium:	\$	
Total Premium:	\$	1,188

THESE DECLARATIONS ARE PART OF THE POLICY DECLARATIONS CONTAINING THE NAME OF THE INSURED AND THE POLICY PERIOD.

ORIGIN: AUSA (512) 481-3328
ELIZABETH GUNTER
AMERICAN ELECTRIC POWER
400 W. 15TH ST., ST 1520

SHIP DATE: 17MAY19
ACTWGT: 4.00 LB
CAD: 109089473/NET4100

AUSTIN, TX 78701
UNITED STATES US

BILL SENDER

TO DAVID EPPLER, ENFORCEMENT OFFICER
U.S. EPA REGION 6
SUPERFUND ENFORCEMENT (6SF-TE)
1445 ROSS AVENUE
DALLAS TX 75202

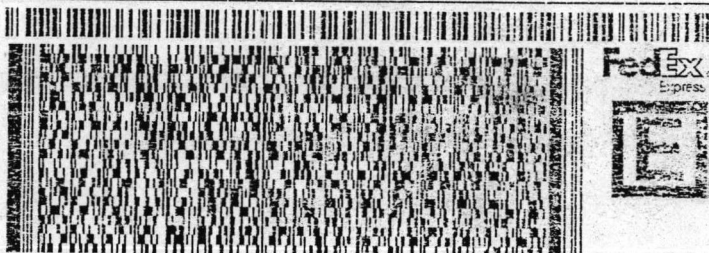
565,116,866-423/40

(214) 665-6529

REF: F.J. DOYLE SUPERFUND SITE

INV.
PO:

DEPT:



MON - 20 MAY 10:30A
PRIORITY OVERNIGHT

TRK# 7752 4851 4707
0201

XH KIPA

75202
TX-US DFW



Eppler David
EPA REGION 6

Phone: 214.665.6529
Received On: 05-20-2019 11:54am

The V

X-RATED

MAY 20 2019

EEA RECEIVING

RT 25
FZ 25

